# BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO.	2015-	-C
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IN RE:	)	
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Application of American Broadband and	)	APPLICATION
Telecommunications Company	Ć	
For Designation as an Eligible	)	
<b>Telecommunications Carrier for the</b>	)	
Purpose of Offering Lifeline Service	)	
on a Wireless Basis	)	

American Broadband and Telecommunications Company ("American Broadband" or the "Company"), by its counsel, respectfully submits this Application for Designation as an Eligible Telecommunications Carrier ("ETC") pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the "Act"), Section 54.201 et seq. of the Rules of the Federal Communications Commission ("FCC"), and S.C. Code Ann. Regs. § 103-690. American Broadband requests that the South Carolina Public Service Commission ("Commission") grant it designation as a wireless ETC in South Carolina for the sole purpose of receiving federal universal service Lifeline support in the geographic areas specified in this Application. American Broadband does not request ETC status for the purpose of receiving support from any of the other Universal Service Funds ("USF"), including high cost and Link Up support. To the extent that certain provisions of S.C. Code Ann. Regs. § 103-690 differ slightly from the Rules of the FCC and the FCC's Lifeline Reform Order, American Broadband requests that the Commission waive those provisions pursuant to the authority granted by S.C. Code Ann.

Regs. § 103-803. The grant of such a waiver is appropriate and not contrary to the public interest.

As discussed in more detail below, American Broadband meets the statutory and regulatory requirements for designation as an ETC and is able and prepared to offer Lifeline-supported services throughout its designated service area in South Carolina. Granting ETC status to American Broadband will benefit the public interest by making the Company's services available to a broad range of low-income consumers. Because the availability of American Broadband's services so clearly serves the interests of South Carolina consumers, American Broadband respectfully requests that the Commission grant this Application expeditiously. In support of this Application, American Broadband provides the following information:

#### I. OVERVIEW OF APPLICANT AND SERVICE OFFERINGS.

American Broadband is a Delaware corporation with principal offices at One Seagate, Toledo, Ohio 43604. The Company is registered with the South Carolina Secretary of State as a foreign limited liability company operating in South Carolina, effective February 25, 2015. American Broadband does not provide service to customers in South Carolina at present.

American Broadband has applications pending for ETC designation in the following states: Alabama, California, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Pennsylvania, Tennessee, Texas, Utah, and Virginia. American Broadband is designated as an ETC provider in the following states: Illinois, Indiana, Kentucky, Maryland, Michigan, Minnesota, Missouri, Ohio, West Virginia, and Wisconsin. None of American Broadband's petitions for ETC designation have been denied.

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American Broadband's petition for these states are pending with the FCC.

American Broadband currently operates as a common carrier, providing wireless mobile phone services to consumers in Georgia, Illinois, Indiana, Kentucky, Maryland, Michigan, Missouri, New York, Ohio, Pennsylvania, West Virginia and Wisconsin. American Broadband plans to operate as a common carrier in many other states, including South Carolina. American Broadband will provide domestic voice and certain data services (such as internet access and text messaging), primarily to low-income consumers. As a reseller of wireless services, American Broadband will purchase wireless network infrastructure and wireless transmission facilities from T-Mobile USA ("T-Mobile"), and SprintCom Wireless and Nextel West Corp. (jointly "Sprint").<sup>2</sup> American Broadband will provide affordable prepaid mobile phone service, including calling and text messaging, along with user-friendly handsets and high quality customer service. American Broadband's products and plans will be specially geared toward serving lower income communities, and its service models and pricing plans will reflect this mission. The Company will not require service contracts from its customers and it will always ensure competitively low pricing for its services and products. By providing affordable service, American Broadband can reach out to those who are often ignored by traditional carriers.

American Broadband will manage all aspects of the customer experience, including setting service pricing, handset selection, marketing materials, and live customer service. The Company's prepaid, budget-friendly pricing will give many low-income consumers the option of having basic mobile phone service without the burden of hidden costs, varying monthly charges, or contractual commitments. Customers will be able to customize their mobile

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American Broadband will purchase the services of Sprint and T-Mobile through an intermediary such as Prepaid Wireless Group.

phone service to suit their needs with American Broadband's available bundles of minutes and text packages to supplement their mobile plan.

American Broadband's customer base likely will be low-income consumers and the majority unlikely will have phone service of any kind prior to enrollment. American Broadband's customers will depend on and benefit greatly from American Broadband's inexpensive and flexible pricing plans. American Broadband will not impose credit checks nor will it require any deposits or contractual commitments. Most of American Broadband's customers likely will turn to American Broadband because they cannot afford the postpaid services provided by traditional wireless carriers. American Broadband will affirmatively reach out to the low-income sector of the consumer base to offer attractive and affordable communications options. As such, American Broadband will contribute to the expansion of mobile wireless services for low-income consumers in South Carolina. In addition, American Broadband intends to seek ETC designation in additional states and jurisdictions so that it may continue to expand the service options for low-income consumers.

## II. AMERICAN BROADBAND SATISFIES THE COMMISSION'S AND THE FCC'S REQUIREMENTS FOR ETC DESIGNATION.

Applicants seeking ETC designation in South Carolina are evaluated under the standards set by the FCC and the Commission. Section 214(e)(2) of the Act provides that, upon request and consistent with the public interest, convenience and necessity, the Commission may designate more than one common carrier as an ETC in areas served by a rural telephone company and shall do so with respect to all other areas, provided that the requesting carrier (i) offers services that are supported by federal universal service support mechanisms and (ii)

advertises the availability of such services.<sup>3</sup> S.C. Code Ann. Regs. § 103-690 requires that applications for ETC designation be granted only if the designation will further federal and state universal service goals. FCC rules and Commission regulations impose additional requirements on a carrier requesting ETC designation. As demonstrated below, American Broadband satisfies each of these requirements.

### 1. American Broadband Will Operate as a Common Carrier.

American Broadband will operate as a common carrier as defined in 47 U.S.C. § 153(11) in South Carolina and thus is eligible for designation as an ETC. The FCC has consistently held that providers of wireless services are to be treated as common carriers for regulatory purposes. Moreover, American Broadband is a Commercial Mobile Radio Services ("CMRS") provider. Section 332(c)(1)(A) of the Act states that CMRS providers will be regulated as common carriers.<sup>4</sup>

## 2. American Broadband Will Provide the Services Designated for Lifeline Support.

The FCC has determined that "voice telephony services" shall be supported by the federal USF program.<sup>5</sup> Eligible voice telephony services must provide:

- voice grade access to the public switched network;
- local usage;
- access to emergency services; and
- toll limitation for qualifying low-income consumers.

Upon receiving the requested designation as an ETC, American Broadband will provide each of these required services throughout its designated service area, as described in more detail below.

<sup>&</sup>lt;sup>3</sup> 47 U.S.C. §214(e)(2); see also 47 C.F.R. § 54.201(d).

<sup>&</sup>lt;sup>4</sup> See 47 U.S.C. § 332(c)(1)(A).

<sup>&</sup>lt;sup>5</sup> 47 C.F.R. § 54.101(a).

Indeed, American Broadband will provide all of these services in each state in which it receives ETC designation. American Broadband's Lifeline service offerings will be provided pursuant to the Company's established rates, as provided in this Petition, and its terms and conditions of service. which available American Broadband's website are at at http://www.americanassistance.com. American Broadband will offer Lifeline subscribers attractive voice telephony service plans under the "American Assistance" brand name, and the Company's Lifeline subscribers will be eligible to receive the same service plans that American Broadband generally will make available to the public.

#### A. Means of providing Lifeline service.

The Company will provide service via resale of underlying carrier services provided by T-Mobile and Sprint. Section 214(e)(1)(A) of the Act provides that an ETC must provide services "using its own facilities or a combination of its own facilities and resale of another carrier's services." Pursuant to the FCC's *Lifeline Reform Order*, however, resellers are granted blanket forbearance from this facilities requirement, subject to conditions, in connection with limited ETC designation to participate in the Lifeline program. The FCC conditioned blanket forbearance on the reseller's compliance with certain ETC obligations, including providing 911 and E911 service regardless of activation status and prepaid minutes available, providing E911-compliant handsets, and replacing E911 non-compliant handsets at no charge to the Lifeline customer. In addition, the reseller must adhere to an FCC-approved compliance

<sup>&</sup>lt;sup>6</sup> 47 U.S.C. § 214(e)(1)(A).

See Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report And Order and Further Notice Of Proposed Rulemaking, 27 FCC Rcd 6656, ¶ 368 (2012) ("Lifeline Reform Order").

<sup>&</sup>lt;sup>8</sup> See id., at ¶ 373.

plan that includes specific information about the reseller's service offerings and that outlines the measures that the reseller will take to implement the obligations established in the *Lifeline Reform Order*.<sup>9</sup>

American Broadband commits to compliance with all of these conditions. To this end, American Broadband submitted to the FCC a compliance plan that meets the requirements of the *Lifeline Reform Order*. A copy of this plan ("Compliance Plan") is appended as **Exhibit A.** On May 25, 2012, American Broadband's compliance plan was approved by the FCC. Therefore, American Broadband is not required to meet the "own facilities" requirement of Section 214(e)(1)(A). Consequently, the Company's proposal to operate as an ETC in South Carolina using resold services is entirely compliant with FCC requirements. To the extent that the Company's proposal to operate using purely resold services is inconsistent with S.C. Code Regs. § 103-690(C)(a)(6), the Company requests waiver of same due to its compliance with FCC requirements.

Pursuant to its ETC designation, American Broadband will provide supported services as follows.

#### B. Voice Grade Access.

The FCC has stated that voice-grade access consists of the ability for a user to make and receive telephone calls within a specified bandwidth.<sup>11</sup> American Broadband will provide this service via resale of T-Mobile and Sprint mobile services to low-income customers in its designated service area.

See 1a., at ¶ 308.

<sup>&</sup>lt;sup>9</sup> See id., at ¶ 368.

American Broadband's certification by affidavit regarding its proposed resale operations is appended as **Exhibit B**.

See Federal-State Joint Board on Universal Service, CC Docket No. 96-45, First Report and Order, 12 FCC Rcd 8776, 8810-11 (1997).

#### C. Local Usage.

The FCC's rules require a petitioner for ETC designation to demonstrate that its proposed local usage plan is comparable to one offered by the incumbent local exchange carrier ("ILEC") in the same designated service area. The determination of comparability requires a case-by-case review, taking into account value-added capabilities and services included within a service plan.

American Broadband will offer "American Assistance," the Company's Lifeline Assistance program, throughout its designated service area in South Carolina.

American Broadband will offer several different Lifeline service packages in South Carolina, including: (1) a 250 voice minutes per month plan at no charge to Lifeline-eligible consumers (after application of the Lifeline subsidy); (2) a 500 voice minutes per month plan for voice calls at a low monthly rate to Lifeline-eligible consumers (after application of the Lifeline subsidy); (3) the ability to apply the \$9.25 Lifeline credit to the Company's non-Lifeline packages (one of which is a plan with unlimited minutes of voice telephone and text messages at a low monthly rate); and (4) an unlimited voice minutes per month plan at no charge to qualified residents of Tribal lands, with 1,000 texts per month. The plans offered by American Broadband do not offer roll over voice minutes or roll over text messages, month to month.

In the 250 voice minutes per month plan, qualified applicants in South Carolina will be eligible to receive the following free service: the qualified applicant will receive a free cell phone, 250 monthly talk minutes of voice at no charge, and 250 text messages per month at no charge. In addition, this plan offers access to 911, free voicemail, caller ID and call waiting, free access to operator service and directory listings for publicly listed, domestic, landline

telephone numbers and addresses, and no annual contracts or monthly bills. This plan will be available throughout American Broadband's service area except in Tribal lands.

In the 500 minutes per month plan, Lifeline qualified applicants in South Carolina will be eligible to receive a free cell phone, 500 monthly talk minutes of voice, and 500 text messages for \$10.70 per month (after application of the \$9.25 Lifeline credit to the non-Lifeline rate of \$19.95). In addition, this plan offers access to 911, free voicemail, caller ID and call waiting, free access to operator service and directory listings for publicly listed, domestic, landline telephone numbers and addresses, and no annual contracts. This plan will be available throughout American Broadband's service area except in Tribal lands.

The Tribal Resident plan will provide a monthly package of unlimited minutes of anytime, local and domestic long distance voice calling and 1,000 text messages per month at no cost to the subscriber after application of the \$34.25 Lifeline credit. Like subscribers to American Broadband's non-Tribal Lifeline plans, qualified residents of Tribal lands will receive access to 911, free voicemail, caller ID and call waiting, free access to operator service and directory listings for publicly listed, domestic, landline telephone numbers and addresses, and are not subject to annual contracts. Residents of Tribal lands may add a data/picture package to the plan at an additional cost of \$15.00 a month. This plan is available only to qualified residents of Tribal lands.

In addition, if granted ETC designation status in South Carolina, American Broadband will offer to Lifeline eligible customers the availability to sign up for the identical packages that the Company intends to offer to its South Carolina non-Lifeline customers throughout its proposed service area, including an unlimited voice and unlimited texting plan. These plans include the following:

<u>Plan – Prepaid</u>	<u>Price Per Month</u>	
Unlimited Voice/Text and 1 GB Data	\$49.95	
1500 Minute Talk/1500 Text	\$29.95	
1000 Texts and 250 Talk Minutes	\$19.95	
4000 Combined Voice Minutes and Text	\$34.25	

American Broadband will apply the \$9.25 Lifeline credit to the non-Lifeline rate listed above for these plans. All of these plans offer access to 911, free voicemail, caller ID and call waiting, free access to operator service and directory listings for publicly listed, domestic, landline telephone numbers and addresses, and no annual contracts.

American Assistance also allows customers to add minutes and texts to their plan as needed, including the following:

100 Talk	100 Talk Minutes	\$6.99
250 Talk and Text	250 Talk Minutes + 250 Text Messages	\$9.99
500 Talk and Text	500 Talk Minutes + 500 Text Messages	\$19.99
1,000 Talk and Text	1,000 Talk Minutes + 1,000 Text Messages	\$29.99
100 Text	100 Text Messages	\$2.99
300 Text	300 Text Messages	\$4.99
500 Text	500 Text Messages	\$7.99
1,000 Text	1,000 Text Messages	\$12.99

These supplemental packages, or "top-up" minutes, will be available for purchase at American Broadband's website and at its retail locations. American Broadband's terms and conditions for services for all plans are included on its website at <a href="https://www.americanassistance.com/program/">www.americanassistance.com/program/</a>.

All plans will include nationwide domestic long-distance at no extra per-minute charge, as well as caller ID, voice mail, call waiting and three-way calling. With these plans, emergency (911) calls will be free, regardless of service activation or availability of minutes, and will not count against the customer's airtime. And, as stated above, the plans will include free customer service (611) (with no usage or fees charged), and no fee directory assistance calls (411); however, 411 calls will count as airtime minutes of usage. Therefore, American Broadband's usage plan is different from, but comparable to, one offered by the ILEC in the same designated service area.

#### D. Access to emergency services.

The Company will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available. As noted, calls to 911 emergency services will always be free and will be available regardless of service activation status or availability of minutes. In addition, American Broadband will comply with any FCC or Commission requirements regarding customer access to 911 and E911 services as well as the provision of E911-compatible handsets, specifically including those obligations imposed as part of the FCC's forbearance grant conditions.

#### E. *Toll limitation for qualifying low-income consumers.*

In its initial operations, American Broadband will not provide toll limitation service ("TLS"). Like most wireless carriers, American Broadband does not differentiate domestic long distance usage from local usage and all usage is paid for in advance. Pursuant to the Lifeline Reform Order, subscribers to such "all-distance" services are not considered to have voluntarily elected to receive TLS.<sup>12</sup> If, in future, American Broadband should offer a Lifeline

<sup>12</sup> *See Lifeline Reform Order*, ¶ 230.

service which differentiates between local usage and long distance usage, the Company commits to provide TLS to customers of that service.

#### F. Service area.

Sections 214(e)(2) and 214(e)(5) of the Act provide that ETC designations shall be made for a "service area," defined as a geographic area established by the Commission. The Company seeks certification to operate as an ETC in the geographic service areas throughout South Carolina where its underlying carriers, Sprint and T-Mobile, provide coverage. A list of the associated exchanges /wire centers the Company proposes to include as its service area is appended as **Exhibit D**. Because it is only seeking ETC designation for purposes of receiving low-income support, the Company requests that the Commission waive the limited portion of S.C. Code Ann. Regs. § 103-690(b) requiring that a "creamskimming analysis" be performed for a designation request below the study area of a rural telephone company. <sup>13</sup>

### 3. American Broadband Will Advertise its Lifeline Service Offerings.

American Broadband will advertise the availability of its services and charges in a manner reasonably designed to reach Lifeline-eligible consumers, as required by Section 54.201(d)(2) and 54.405(b) of the FCC Rules as well as Commission regulations. The Company intends to advertise its Lifeline services using media of general distribution. Moreover, American Broadband will expand its advertising efforts as necessary to ensure that Lifeline-eligible customers are aware of the Company's service offerings. Consistent with S.C.

Consistent with FCC holdings, there is no need for a "creamskimming" analysis in connection with American Broadband's Application because the Company is seeking ETC designation only for purposes of receiving federal low-income support. *See*, *e.g.*, *Virgin Mobile USA*, *L.P.*, Order, 24 FCC Rcd 3381, ¶ 39 n. 101 (2009).

<sup>&</sup>lt;sup>14</sup> 47 C.F.R. §§ 54.201(d)(2), 54.405(b); S. C. Code Ann. Regs. 103-690.

<sup>&</sup>lt;sup>15</sup> See 47 C.F.R. § 214(e)(1)(B) and 47 C.F.R. § 54.201(d)(2).

<sup>&</sup>lt;sup>16</sup> See 47 C.F.R. § 54.405(b).

Code Regs. § 103.690(C)(a)(1)(C), American Broadband provides a two-year plan for the Company's advertising and outreach program in South Carolina as **Exhibit C**.<sup>17</sup> An example of American Broadband's marketing is found in Exhibit C of the Company's most recently revised Compliance Plan (**Exhibit A**).

In addition, American Broadband will comply with the FCC's revised rules regarding information to be included in marketing materials, including FCC revised rule section 54.405(c). Specifically, American Broadband's marketing materials will state, in easily understood language, that: (i) the service is a Lifeline service; (ii) Lifeline is a government assistance program; (iii) the service may not be transferred to someone else; (iv) consumers must meet certain eligibility requirements before enrolling in the Lifeline program; (v) the Lifeline program permits only one Lifeline discount per household; (vi) documentation is necessary for enrollment; and (vii) American Broadband is the provider of the services. Moreover, American Broadband's Lifeline application/certification form<sup>18</sup> will state that Lifeline is a federal benefit and that consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program. American Broadband's Compliance Plan contains an example of the type of advertising materials that American Broadband intends to use in South Carolina.

## 4. American Broadband Complies with the Commission's and the FCC's Additional Obligations for ETCs.

A. American Broadband certifies that it will comply with the applicable FCC service requirements.

The Company's certification by affidavit regarding its proposed advertising (and various other matters) is appended as **Exhibit B**.

See Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Erratum, ¶ 63 (rel. May 16, 2012).

Per the requirements of 47 CFR § 54.202(a)(1)(i), American Broadband certifies that it will comply with the service requirements applicable to the low-income support it receives as a result of designation as an ETC for the purposes of receiving Lifeline.

B. American Broadband has the ability to remain functional in emergency situations. <sup>19</sup>

American Broadband's Lifeline services will remain functional in emergency situations. As discussed herein, American Broadband will utilize the extensive and well-established Sprint and T-Mobile networks and facilities to provide American Broadband's mobile services. The Company understands that the Sprint and T-Mobile networks are capable of managing traffic spikes that may occur during emergency situations and can reroute traffic in the event of damaged facilities. American Broadband also understands that each carrier has sufficient back-up power to ensure functionality if its external power supply is unavailable. Indeed, both companies have repeatedly certified to the FCC that their networks function in emergency situations.<sup>20</sup> Sprint and T-Mobile will provide the same functionality to American Broadband and American Broadband's customers as these carriers provide to themselves and their own customers.

C. American Broadband will satisfy applicable consumer protection and service quality standards.

The FCC's rules and S.C. Code Regs. § 103-690(C)(1)(C)(3) require the petitioner to demonstrate that it satisfies applicable consumer protection and service quality standards. The FCC and this Commission have determined that a wireless petitioner's

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<sup>&</sup>lt;sup>19</sup> See, e.g., 47 C.F.R. § 54.202(a)(2), S.C. Code Regs. § 103-690(C)(1)(C)(2).

See, e.g., Sprint Nextel Corporation Verified Filing in Compliance with 47 C.F.R. § 54.209, CC Docket No. 96-45, at 6 (filed Sept. 30, 2011); In the Matter of Telecommunications Carriers Eligible for Universal Service Support, Petition of T-Mobile USA, Inc. for Designation as a Low-Income Eligible Telecommunications Carrier, et al., WC Docket No. 09-197, at 20 (released Aug. 16, 2012).

commitment to comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service ("CTIA Consumer Code") will satisfy this requirement. American Broadband commits to comply with the CTIA Consumer Code to ensure that the Company offers its subscribers the highest level of protection and quality service.

American Broadband's pledge to provide quality service and to comply with the CTIA Consumer Code evidences its commitment to satisfy all of the consumer protection and service quality standards applicable to Lifeline services. The Company will make every effort to resolve expeditiously complaints received by the Commission.

D. American Broadband is financially and technically capable of providing Lifeline services in compliance with the FCC's rules.

The FCC's rules, as revised,<sup>21</sup> require ETC petitioners to demonstrate financial and technical capability to comply with the FCC's Lifeline service requirements.<sup>22</sup> Among the factors to be considered are: a carrier's prior offering of service to non-Lifeline subscribers, the length of time the carrier has been in business, whether the carrier relies exclusively on Lifeline reimbursement to operate, whether the carrier receives revenues from other sources; and whether the carrier has been the subject of an enforcement action or ETC revocation proceeding.

American Broadband receives revenue from a number of sources which are completely independent from the revenue it will receive in the form of Lifeline reimbursements. American Broadband's revenue stream includes income from the sale of non-lifeline prepaid and postpaid telecommunications services to customers in Illinois, Indiana, Kentucky, Michigan, Ohio, New York, Pennsylvania and Wisconsin. In addition, American Broadband has provided non-Lifeline prepaid domestic telecommunications since 2004 and has a substantial non-Lifeline

<sup>22</sup> Lifeline Reform Order, ¶¶ 387-388 (revising 47 C.F.R. § 54.202(a)(4)).

See, e.g., revised 47 C.F.R. § 54.202(a)(4).

customer base. American Broadband receives revenues from these non-Lifeline retail offerings. Consequently, American Broadband will not be relying exclusively on Lifeline reimbursement for its operating revenues. In addition, the Company has not been subject to ETC enforcement sanctions or revocation proceedings in any state.

E. American Broadband will comply with FCC requirements for certification and verification.

American Broadband is aware of the FCC's current requirements regarding certification and verification of a customer's qualification for Lifeline service and has implemented procedures to ensure these requirements are met. As described in American Broadband's Compliance Plan, the Company has set in place detailed and comprehensive procedures to address customer certification and verification requirements as well as requirements concerning de-enrollment and duplication of service. Specifically, American Broadband has the following Checklist in place to make sure that a potential subscriber's eligibility determination takes place prior to activating Lifeline service for a consumer:

- Assure that the consumer is not an existing American Broadband customer;
- Assure that the consumer is not receiving a Lifeline benefit from another company through the NLAD Database;
- Confirm that there is not a duplicate address in existence in the American Broadband active customer database;
- Send a non-activated handset to qualified addresses only; and
- Require the consumer to activate the phone prior to receiving any Lifeline service.

American Broadband further confirms that it will not provide a consumer with an activated device and will not activate a Lifeline service unless or until it has confirmed that the consumer is a qualifying low-income consumer pursuant to 47 C.F.R. § 54.409, and completed

the required eligibility determination and certification requirements of 47 C.F.R. §§ 54.410(a), 54.404-54.405. These procedures comply with the FCC's revised customer certification and verification requirements.<sup>23</sup>

American Broadband also will comply with both the FCC's annual certification and reporting requirements and the FCC's measures to prevent waste, fraud and abuse of Lifeline services.<sup>24</sup> In particular, Section IV.A. of American Broadband's Compliance Plan discusses steps that the Company will take to ensure activation of service and to implement de-enrollment in the event of inactivity for a period of 60 days.

F. American Broadband will comply with Commission and FCC requirements for fees, charges, and reports.

American Broadband will comply with all applicable Commission and FCC requirements with respect to fees, charges, and reports. The Company will not collect service deposits for its plans and will not charge a number-portability fee for Lifeline accounts.<sup>25</sup> In addition, American Broadband will timely pay all applicable federal, state, and local regulatory fees, including universal service and E911 fees. Furthermore, American Broadband will comply with the FCC's annual reporting requirements for ETCs as set forth in Section 54.422 of the FCC's Rules,<sup>26</sup> and with the Commission's annual reporting requirements, as set forth in S.C. Code Regs. 103-690.1.

G. American Broadband will comply with Commission and FCC requirements on relinquishment of ETC designation.

<sup>&</sup>lt;sup>23</sup> See 47 C.F.R. §§ 54.410.

See 47 C.F.R. §§ 54.416, 54.422; See also In re: Telecommunications Carriers Eligible for Universal Service Support; Virgin Mobile USA, L.P. Petition for Designation as an Eligible Telecommunications Carrier in the State of Alabama, et al., 25 FCC Rcd 17797, ¶ 24 (2010).

<sup>&</sup>lt;sup>25</sup> See 47 C.F.R. § 54.401(c), (e).

<sup>&</sup>lt;sup>26</sup> See 47 C.F.R. § 54.422.

If at some point in the future, American Broadband seeks to relinquish its ETC designation, American Broadband will comply with the requirements of 47 C.F.R. § 54.205.

#### III. DESIGNATED CONTACT INFORMATION.

The legal name, address and telephone number of the Company and its designated contact person is:

> American Broadband and Telecommunications Company One Seagate Toledo, Ohio 43604 (419) 824-5810 (419) 205-9014

E-mail: JAnsted@ambt.net

Designated contact person: Jeffrey Ansted, President

The name, address and telephone number of the Company's attorney is:

jack.pringle@arlaw.com

John J. Pringle, Jr. (SC Bar No. 11208) ADAMS AND REESE, LLP 1501 Main Street, 5<sup>th</sup> Floor Columbia, South Carolina 29201 Telephone: (803) 343-1270 Facsimile: (803) 799-8479

#### With a copy to:

Henry T. Kelly Michael R. Dover Kellev Drve & Warren LLP 333 West Wacker Drive, 26th Floor Chicago, IL 60606 (312) 857-7070 hkelley@kelleydrye.com mdover@kelleydrye.com

#### IV. GRANT OF THIS APPLICATION WILL SERVE THE PUBLIC INTEREST.

Designation of American Broadband as an ETC for Lifeline purposes will further the Commission's universal service goals and thus benefit South Carolina consumers, consistent with S.C. Code Ann. Regs. § 103-690(C)(b). Specifically, the Company will offer prepaid low

cost wireless service to low-income consumers, thereby increasing consumer choice. In addition, increasing customer choice will spur wireless ETC providers to compete for eligible customers by providing the highest value (e.g., higher quality handsets, superior customer service). Further, grant of the Application will provide consumers with access to high quality service and the benefits of a mobile service.<sup>27</sup> The mobility of the service will be particularly attractive to Lifeline-eligible consumers who may frequently change residences or work in migratory jobs. Wireless service offers a stable contact method where traditional landline service would be unavailable or not a viable option. American Broadband's prepaid wireless service is an especially attractive option for low-income consumers because it alleviates customer concerns regarding hidden costs, varying monthly charges and long term contract issues.

Many consumers in South Carolina are faced with making difficult choices about how to allocate and spend their limited resources. The ability to meet their communications needs while at the same time anticipating and controlling the associated costs is critical. American Broadband's prepaid service offerings and supplemental mobile phone plans enable customers to tailor their wireless services to their needs and budgets, and the prepaid nature of the service also provides an alternative for "unbanked" consumers. Further, American Broadband will not impose credit checks thereby providing an alternative for those low-income consumers unable to obtain credit for post-paid services provided by traditional carriers.

American Broadband's prepaid mobile calling service package will provide low-income consumers with a generous number of included, low-cost, anytime minutes to the

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As discussed above, American Broadband will comply with the Consumer Code for Wireless Service of CTIA – The Wireless Association, and applicable South Carolina consumer protection and service quality standards.

consumers, as well as free Caller ID, Call Waiting, Call Forwarding, Basic Voicemail, and calls to 911 services. These "free" services and low-cost minutes are an invaluable resource for cash-strapped consumers who may be seeking employment and need a means to contact potential employers. The package is also useful for those consumers that need the ability to stay in touch with children or other family members, as well as to contact 911 emergency services when needed. American Broadband's services will provide consumers with a valuable alternative for obtaining telephone service. This competition in turn could spur other service providers to improve their service options.

#### V. CONCLUSION

As demonstrated in this Application, grant of Lifeline-only ETC designation to American Broadband is consistent with the Act, the FCC's and Commission's rules and, in particular, with the Commission's obligation to ensure that such designations further the public interest. Therefore, American Broadband respectfully requests that the Commission expeditiously issue an order designating the Company as an ETC in South Carolina, as described above, and grant such other relief as it deems appropriate.

#### AMERICAN BROADBAND AND TELECOMMUNICATIONS COMPANY

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Attorneys for American Broadband and Telecommunications Company

March 4, 2015

### Exhibit A

American Broadband and Telecommunications Company FCC Compliance Plan

(Approved May 25, 2012)

Federal Communications Commission 445 12<sup>th</sup> St., S.W. Washington, D.C. 20554

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DA 12-828

Release Date: May 25, 2012

WIRELINE COMPETITION BUREAU APPROVES THE COMPLIANCE PLANS OF AMERICAN BROADBAND & TELECOMMUNICATIONS, BUDGET PREPAY, CONSUMER CELLULAR, GLOBAL CONNECTION, TERRACOM AND TOTAL CALL

#### WC Docket Nos. 09-197 and 11-42

The Wireline Competition Bureau (Bureau) approves compliance plans of six telecommunications carriers: American Broadband & Telecommunications; Budget Prepay, Inc.; Consumer Cellular, Inc.; Global Connection, Inc. of America; TerraCom, Inc.: and Total Call Mobile, Inc. filed pursuant to the *Lifeline Reform Order* as a condition of obtaining forbearance from the facilities requirement of the Communications Act of 1934, as amended (the Act), for the provision of Lifeline service. <sup>1</sup>

The Act provides that in order to be designated as an eligible telecommunications carrier for the purpose of universal service support, a carrier must "offer the services that are supported by Federal universal service support mechanisms . . . either using its own facilities or a combination of its own facilities and resale of another carrier's services . . . ."<sup>2</sup> The Commission recently amended its rules to define voice telephony as the supported service and removed directory assistance and operator services, among other things, from the list of supported services.<sup>3</sup> As a result of these amendments, many Lifeline-only ETCs that previously met the facilities requirement by relying on operator services, directory assistance or other previously supported services no longer meet the facilities requirement of the Act.<sup>4</sup> In the *Lifeline Reform Order*, the Commission found that a grant of blanket forbearance of the facilities

<sup>&</sup>lt;sup>1</sup> See Lifeline and Link Up Reform and Modernization et al, WC Docket No.11-42 et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11, at paras. 379-380 (rel. Feb. 6, 2012) (*Lifeline Reform Order*). A list of the compliance plans approved through this Public Notice can be found in the Appendix to this Public Notice.

<sup>&</sup>lt;sup>2</sup> 47 U.S.C. § 214(e)(1)(A).

<sup>&</sup>lt;sup>3</sup> See Connect America Fund, WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, 17692-93, paras. 77-78, 80 (2011) (*USF/ICC Transformation Order*); pets. for review pending sub nom. In re: FCC 11-161, No. 11-9900 (10th Cir. filed Dec. 8, 2011); Connect America Fund, WC Docket No. 10-90 et al., Order on Reconsideration, 26 FCC Rcd 17633, 17634-35, para. 4 (2011) (*USF/ICC Transformation Order on Reconsideration*).

<sup>&</sup>lt;sup>4</sup> See Lifeline Reform Order, FCC 12-11, at para. 366, App. A; USF/ICC Transformation Order on Reconsideration at para. 4. Some ETCs have included language in their compliance plans indicating that they have facilities or plan to acquire facilities in the future. See, e.g., Budget PrePay, Inc. Petition for Designation as an Eligible Telecommunications Carrier, WC Docket Nos. 09-197 and 11-42, Compliance Plan of Budget PrePay, Inc. at 3 n. 6 (filed May 1, 2012). To the extent ETCs seek to avail themselves of the conditional forbearance relief established in the Lifeline Reform Order, we presume they lack facilities to provide the supported service under section 54.101 and 54.401 of the Commission's rules. See 47 C.F.R. §§ 54.101 and 54.401. Such ETCs must comply with the compliance plan approved herein in each state or territory where they are designated as an ETC, regardless of their claim of facilities for other purposes, such as eligibility for state universal service funding.

requirement, subject to certain public safety and compliance obligations, is appropriate for carriers seeking to provide Lifeline-only service.<sup>5</sup> Therefore, in the *Lifeline Reform Order*, the Commission conditionally granted forbearance from the Act's facilities requirement to all telecommunications carriers seeking Lifeline-only ETC designation, subject to the following conditions: (1) compliance with certain 911 and enhanced 911 (E911) public safety requirements; and (2) Bureau approval of a compliance plan providing specific information regarding the carrier and its service offerings and outlining the measures the carrier will take to implement the obligations contained in the *Order*.<sup>6</sup>

The Bureau has reviewed the compliance plans listed in the Appendix for conformance with the *Lifeline Reform Order*, and now approves those six compliance plans.<sup>7</sup>

Filings, including the Compliance Plans identified in the Appendix, and comments are available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12<sup>th</sup> Street, S.W., Room CY-A257, Washington, D.C. 20554. They may also be purchased from the Commission's duplicating contractor, Best Copy and Printing, Inc., Portals II, 445 12<sup>th</sup> Street, S.W., Room CY-B402, Washington, D.C. 20554, telephone: (202) 488-5300, fax: (202) 448-5563, or via email www.bcpiweb.com.

People with Disabilities: To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an email to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at (202) 418-7400 or TTY (202) 418-0484.

For further information, please contact Divya Shenoy, Telecommunications Access Policy Division, Wireline Competition Bureau at (202) 418-7400 or TTY (202) 418-0484.

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<sup>&</sup>lt;sup>5</sup> See Lifeline Reform Order, FCC 12-11 at paras. 368-381.

<sup>&</sup>lt;sup>6</sup> See id. at paras. 373 and 389. Subsequently, the Bureau provided guidance for carriers submitting compliance plans pursuant to the *Lifeline Reform Order*. Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order, WC Docket Nos. 09-197 and 11-42, Public Notice, 27 FCC Rcd 2186 (Wireline Comp. Bur. 2012).

<sup>&</sup>lt;sup>7</sup> The Commission has not acted on any pending ETC petitions filed by these carriers, and this Public Notice only approves the compliance plans of the carriers listed above. While these compliance plans contain information on each carrier's Lifeline offering, we leave it to the designating authority to determine whether or not the carrier's Lifeline offerings are sufficient to serve consumers. *See Lifeline Reform Order*, FCC 12-11 at paras. 50 and 387.

### Appendix

Petitioner	Compliance Plans	Date of Filing	Docket
	As Captioned by		Numbers
	Petitioner		
American Broadband & Telecommunications	American	April 27, 2012	09-197; 11-42
	Broadband &		
	Telecommunications		
	Revised Compliance		
	Plan		
Budget PrePay, Inc.	Compliance Plan of	May 1, 2012	09-197; 11-42
	Budget PrePay, Inc.		
Consumer Cellular, Inc.	Consumer Cellular	April 18, 2012	09-197; 11-42
	Amended Revised		
	Compliance Plan		
Global Connection, Inc. of America	Global Connection	April 30, 2012	09-197; 11-42
	Inc. of America		
	Compliance Plan		
TerraCom, Inc.	TerraCom, Inc.	May 1, 2012	09-197; 11-42
	Second Revised		
	Blanket Forbearance		
	Compliance Plan		
Total Call Mobile, Inc.	Total Call, Inc.	May 17, 2012	09-197; 11-42
	Revised Compliance		
	Plan		

# BEFORE THE FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

)	
In the Matter of	
Federal-State Joint Board on ) Universal Service )	WC Docket No. 09-197
Lifeline and Link Up Reform Modernization)	WC Docket No. 11-42
Petition for Forbearance )	

## AMERICAN BROADBAND & TELECOMMUNICATIONS REVISED COMPLIANCE PLAN

#### **Background**

On February 25, 2011, American Broadband & Telecommunications ("American Broadband" or "Company") filed a Petition for Forbearance ("Petition") requesting that the Federal Communications Commission ("FCC" or "Commission") forbear from enforcement of section 214(e)(1)(A) of the Act, which requires eligible telecommunications carriers ("ETC") to use their own facilities to provide services supported by the Universal Service Fund ("USF"). The Commission issued a Public Notice seeking comment on American Broadband & Telecommunications' Petition and no comments opposing the Petition were filed. On June 30, 2011, the Company filed its initial draft Compliance Plan outlining its proposed compliance with the usual Commission conditions for ETCs. The Commission sought comment on the Plan and the Company subsequently filed an updated draft Plan on December 2, 2011.

Wireline Competition Bureau Seeks Comments on American Broadband & Telecommunications Petition for Forbearance from Eligible Telecommunications Carrier Facilities Requirement, Public Notice, DA 11-641 (rel April 7, 2011).

On January 31, 2012, the Commission approved several modifications to its Lifeline rules and provided blanket forbearance for non-facilities-based carriers wishing to provide Lifeline only services. In the *Lifeline Reform Order*, the Commission noted that a carrier must comply with 911 requirements (which American Broadband already does) and file a Compliance Plan that provides specific information on the low income offerings of the carrier as well as outlining the steps the carrier will take to comply with the order, specifically with regards to the prevention of waste, fraud and abuse. On March 13, 2012, American Broadband filed a revised compliance plan pursuant to the *Lifeline Reform Order*. With this filing, American Broadband makes several minor revisions to the March 13 filing. Through this revision, American Broadband demonstrates its current compliance with the *Lifeline Reform Order*, and willingness to comply with forthcoming procedures outlined in the order (such as use of the National Lifeline database), when such procedures become effective.

The Lifeline Reform Order also states that carriers like American Broadband who have pending Compliance Plans at the Commission should revise them to comply with the Lifeline Reform Order.<sup>4</sup> As such, American Broadband files this revised Compliance Plan, which complies with the requirements of the Lifeline Reform Order. American Broadband respectfully requests expeditious approval of its proposed Compliance Plan.

Lifeline and Link Up Reform and Modernization, et al, Report and Order and Further Notice of Proposed Rulemaking, WC Docket 11-42, et al, FCC 12-11, (rel. February 6, 2012) ("Lifeline Reform Order").

<sup>&</sup>lt;sup>3</sup> Lifeline Reform Order, ¶ 368.

<sup>4</sup> Id., at n. 983.

#### **COMPLIANCE PLAN**

American Broadband commends the Commission's commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including Lifeline customers. American Broadband will comply with all conditions set forth in any Commission order, the provisions of this Compliance Plan, and all laws and regulations governing its provision of Lifeline-supported wireless service (both non-facilities-based and facilities-based) to customers throughout our service territories and in addition take the steps set forth herein.

#### I. Access to 911 and E911 Services

American Broadband will provide its Lifeline customers with access to 911 and E911 services immediately upon activation of service. The Commission removed the requirement to obtain PSAP certifications from Low Income only ETCs in the *Lifeline Reform Order*, but reaffirmed the obligation to provide consumer access to 911 and E911 regardless of activation status and to provide E911-compliant handsets.<sup>5</sup> American Broadband can comply with both requirements immediately.

The Commission and consumers are hereby assured that all American Broadband customers will have available access to emergency calling services at the time that Lifeline service is initiated, and that such 911 and E911 access will be available from American Broadband handsets, even if the account associated with the handset has no minutes remaining. All Lifeline customers will have meaningful access to emergency calling services at the time the

<sup>&</sup>lt;sup>5</sup> Lifeline Reform Order, ¶¶ 373-75.

customer activates Lifeline service, and that such access will continue regardless of the customer's account status of the availability of prepaid minutes.

The Company's existing practices currently provide access to 911 and E911 services to the extent that these services have been deployed by its underlying carriers, such as Sprint and Verizon. American Broadband also currently enables 911 emergency calling services for all properly activated handsets regardless of whether the account associated with the handset is active, suspended or terminated. Finally, the Company transmits all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

#### II. E911-Compliant Handsets

American Broadband & Telecommunications will ensure that all handsets used in connection with the Lifeline service offering will be E911-compliant. In fact, American Broadband's phones have always been and will continue to be 911 and E911-compliant. American Broadband uses phones from Sprint and Verizon that have been through a stringent certification process in either Sprint's or Verizon's handset certification lab, which ensures that the handset models used meet all 911 and E911 requirements. As a result, any customer that qualifies for and elects Lifeline service will already have a 911/E911-compliant handset, which will be confirmed at the time of enrollment in the Lifeline program. In the event that an existing customer does not have an E911-compliant handset, American Broadband will replace it with a new 911/E911-compliant handset at no charge to the customer. Any new customer that qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911-compliant handset as well, free of charge.

#### III. Certification of Lifeline Customers' Eligibility

To safeguard against misuse of the Lifeline service plan, American Broadband will deal directly with the customer and collect initial and annual certifications required by the *Lifeline Reform Order*. As required by the Order, American Broadband will establish safeguards to prohibit more than one supported service for each household. American Broadband proposes the following plan to implement these certification and verification conditions and will modify the plan to conform to any new rules and orders, once issued and effective:

#### A. Policy

American Broadband will comply with the minimum federal certification and verification requirements for Lifeline eligibility and any additional requirements established by the states where it is designated as an ETC.

In addition to any state-imposed requirements, American Broadband will certify at the outset and will verify annually consumers' Lifeline eligibility in accordance with the Commission's requirements. American Broadband will enact the same stringent requirements of annual re-certification that it currently uses with its wireline Lifeline service offering. This process requires a customer signed, annual certification form to be entered into our systems prior to any benefits being extended for the next year.

#### **B.** Certification Procedures

American Broadband will implement certification procedures that enable consumers to demonstrate their eligibility for Lifeline assistance by contacting American Broadband via telephone, facsimile, or the Internet. At the point of sale, consumers will be provided with printed information describing American Broadband's Lifeline program, including eligibility requirements, and instructions for enrolling. Materials from USAC, that will be developed

pursuant to the *Lifeline Reform Order*, may also be provided at the point of sale. Specific information will be provided to educate consumers about the one per household rules. Consumers will be signed up in person or directed via Company literature or advertising to a toll-free telephone number and to American Broadband's website, which will contain a link to information regarding the Company's Lifeline service plan, including a detailed description of the program and state-specific eligibility criteria. American Broadband's application form for its wireless service will identify that it is a "Lifeline" application. A sample application form is attached hereto as Exhibit A. In addition to this document, applicants will be required to complete USAC's application form that will be developed pursuant to the *Lifeline Reform Order*, when that form is available.<sup>6</sup>

American Broadband understands and accepts the Commission's requirement that the Company have direct contact with all customers applying for participation in the Lifeline program. American Broadband enrolls individuals through two methods: person-to-person sign-up at areas set up at state government agencies or by application submitted by the individual. First, American Broadband has an employee or agent located in state government offices where members of the public come to meet with their case workers and sign up for various state programs. The agent will explain the eligibility requirements for the program, including participation in a qualifying program or earning income below 135% of the Federal Poverty Guidelines and will verify the individual's eligibly based on a meeting with the person's case worker and verifying documentation obtained from the case workers. The agent will also explain the program limitation of only one Lifeline service per household. Before the service is

<sup>6</sup> Lifeline Reform Order, ¶ 78.

authorized, the individuals eligibility is also verified through the relevant databases as described in further detail below.

Alternatively, individuals may obtain a copy of the application at these state government offices, fill out the necessary information, sign the form and fax them to American Broadband for processing. These applications are also verified through the state case workers and review of the necessary documentation from the case worker. If an individual contacts American Broadband for service via phone, they are instructed to visit an agent (located in governments offices) to receive an application, complete it and fax it to the company. American Broadband does not undertake any outbound telemarketing nor do they accept applications online or over the phone. American Broadband will provide Lifeline-specific training to all personnel, whether employees or agents, that interact with actual or prospective consumers with respect to obtaining, changing or terminating its Lifeline services.

Consumers who do not complete the application process in person must return the signed application and support documentation to the Company, normally by fax. In the future, should the Company use an electronic application process, consistent with Commission regulations, the Company will develop a system to accept electronic signatures that meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 USC § 7001-7006, and any applicable state laws. Processing of consumers' applications, including review of all application forms and relevant documentation will be performed under American Broadband's supervision by managers experienced in the administration of the Lifeline program. American Broadband will ensure that all required documentation is taken care of properly by using state-specific compliance checklists.

In addition to the Commission's requirements, in states with program-based eligibility criteria, the form will list each of the qualifying programs, and the applicant will be required to identify the program(s) in which they participate, and to furnish proof that they currently participate in such program(s). For states with income-based eligibility criteria, the applicant will be required to certify under penalty of perjury that their household income does not exceed the relevant threshold (e.g., 135% of the Federal Poverty Guidelines for federal default states) and will be required to provide proof of income-based eligibility. American Broadband will not retain copies of this information, but rather will maintain a database that records what information was provided. Notwithstanding the foregoing with respect to program or income eligibility, for states that require American Broadband to enroll subscribers identified by the state or as eligible in a state database, American Broadband may continue to rely on the state identification or database. In addition, the Lifeline application form will include a certification section where the applicant must attest and sign under penalty of perjury that the applicant's representations are true and correct. Applicants will also be required to certify under penalty of perjury that they are head of their household and receive Lifeline-supported service only from American Broadband. Penalties for perjury will be clearly stated on the certification form. American Broadband will use substantially the following form of its certification both in the initial application and annually:

By signing below, I certify under penalty of perjury – (additionally, please initial each of the 11 statements below)

1. The information contained within this application is true and correct. I acknowledge that providing false or fraudulent documentation in order to receive assistance is punishable by fines, imprisonment, de-enrollment or being barred from the program

<sup>&</sup>lt;sup>7</sup> Lifeline Reform Order, ¶ 101.

2. I understand that Lifeline is a federal benefit and is only available for one phone line per household, whether landline or wireless. For purposes of the Lifeline program, a household is any individual or group of individuals who live together at the same address and share income and expenses. Violation of the one-per-household requirement is a violation of FCC rules, will result in de-enrollment from the Lifeline program and potentially prosecution by the federal government.
3. I understand that households are not permitted to receive Lifeline benefits from multiple providers. (Some Lifeline services are not marketed under a "Lifeline" name; these include Lifeline services sold under the names AT&T Lifeline, Assurance Wireless, and Safelink.) I certify that to the best of my knowledge, I, and any members of my household, will only receive Lifeline from American Broadband & Telecommunications (AB&T)
4. I understand that I must notify AB&T within 30 days if I cease to participate in a qualifying federal program or my annual household income exceed this threshold.
5. I understand that I must cancel any Lifeline service or port my number to AB&T prior to establishing my service with AB&T
6. I understand that Lifeline is a non-transferrable benefit and certify that I will only use this phone for my household's own use and will not resell or transfer it
7. I will notify AB&T within 30 days if I, or any member of my household, no longer qualify for Lifeline, I or any members of my household move, or if I, or any member of my household, are receiving more than one Lifeline-supported service
8. I understand that I may be required to re-certify my continued eligibility at any time, and at least annually, and failure to so will result in the termination of my Lifeline benefits
9. I certify that I meet the income-based or program-based eligibility criteria for receiving Lifeline service as described by FCC rules
10. I understand that my name, telephone number, and address will be divulged to the Universal Service Administrative Company (USAC) (the administrator of the program) and/or its agents for the purpose of verifying that I, or my household, do not receive more than one Lifeline benefit. I consent to inclusion of this information in the support database
11. I understand that if I have listed a temporary residential address, I will be required to verify my temporary residential address every 90 days
Perjury and false statements are punishable by fines and/or imprisonment.

Signature	(required	) Date

To the extent that USAC's disclosure and application form that is to be developed pursuant to the Lifeline Reform Order duplicates these disclosures, this form may be modified to eliminate duplication or eliminated outright if fully covered by the USAC certification form. In such event, American Broadband will use the USAC-developed certification form. Customers will also be provided a verification form consistent with parameters described in the annual Verification section described below. The application forms will require each applicant to provide their name and permanent residential address, and a billing address if different. American Broadband will incorporate this information into its customer information database. These forms will also collect a customer's date of birth and last four digits of the customer's Social Security Number as required by the Lifeline Reform Order.<sup>8</sup> Prior to initiating service for a customer, the Company will check the name and address of each Lifeline applicant (and the personal information required for verification) against its database to determine whether or not it is associated with a customer that already receives Lifeline-supported service, and will then review the application to ascertain whether the applicant is attempting to receive Lifelinesupported service for more than one handset or wireline phone associated with the address. American Broadband will also check the name and address against the national Lifeline database prior to initiating service, once such database is operational. If the Lifeline applicant or address is listed as a duplicate, the applicant will be required to complete the certification developed by USAC, that they live at a multiple household address. American Broadband will also verify a customer's eligibility using the database by collecting the customer's data of birth and last four digits of the customer's social security number and using this information to complete the

<sup>&</sup>lt;sup>8</sup> Lifeline Reform Order, ¶ 184.

verification process established by the *Lifeline Reform Order*. In addition, prior to requesting a subsidy, American Broadband will process and validate American Broadband's subsidy data, consistent with the standard procedures to be established by USAC and the forthcoming Lifeline database to automatically prevent any household that is already receiving a Lifeline subsidy for services provided by American Broadband from receiving a second Lifeline subsidy in that same month. Further, any prepaid customers who do not use the service in the first instance or who have not used the service within the past 60 days will not be considered active customers for the purposes of requesting subsidies. For customers who are de-activated for non-usage, American Broadband will update USAC's Lifeline database (when it becomes operational) within one business day of the de-enrollment of the customer from the Lifeline service. American Broadband will provide Lifeline-specific training to all personnel, whether employees or agents, that interact with actual or prospective consumers with respect to obtaining, changing or terminating its Lifeline services.

American Broadband shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that the procedures it will implement will prevent American Broadband customers from engaging in such abuse of the program. American Broadband will make full use of the national Lifeline database when it is operational. In the interim, because of American Broadband's relationship with multiple government agencies throughout our service territory, we are also able to certify eligibility directly with the state agency that provides benefits which qualify customers for Lifeline eligibility.

<sup>9</sup> See Usage Policy, below.

# C. Verification Procedures

American Broadband will require every consumer enrolled in the Lifeline program to verify on an annual basis that they are the head of their household and only receive Lifeline service from one ETC. 10 American Broadband will notify each participating Lifeline consumer prior to their service anniversary date that they must confirm their continued eligibility in accordance with the applicable requirements. This notification will be mailed via the U.S. Postal Service to the address the subscriber has on record with American Broadband. The notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact American Broadband. Customers will have 60 days to complete the form, certify under penalty of perjury that they are the head of household and receive Lifeline service only from American Broadband, and return the form to American Broadband by mail or other means that may be developed in the future. The form will remind customers that Lifeline is a federal benefit, that it is only available for one line per household, that "household" in the context of the certification means any individual or group thereof who live together at the same address and share income and expenses, and that a household may not have service from multiple providers. The form will include a statement that violation of these rules constitutes a violation of the program's rules that will result in immediate de-enrollment from the program and could be the basis for federal criminal prosecution. 11 Anyone who does not respond to the mailing and certify their continued eligibility will be de-enrolled from the Lifeline program.

Lifeline Reform Order, ¶ 92. Note that in the future, American Broadband may elect to have USAC administer the self-certification process on its behalf, to the extent that option is available in a given state.

Lifeline Reform Order, ¶ 121.

Currently, customers will be required to complete the verification process by mail; however, American Broadband will offer additional options, such as web-based methods, in the future. Such verification will be required in order for the consumer to continue to receive free Lifeline service or to purchase prepaid airtime from American Broadband at the discounted rate only available to those customers who are enrolled in its Lifeline program. American Broadband will report annually on its verification and re-verification procedures as required by the recently amended section 54.416 of the Commission's Rules.<sup>12</sup>

American Broadband submits that its Compliance Plan fully satisfies the conditions of the *Lifeline Reform Order*. Implementation of the procedures, outlined in this plan, will promote public safety and ensure that Lifeline customers have access to 911 and E911 services while safeguarding against misuse of the company's Lifeline service benefits.

# IV. Additional Measures to Prevent Waste, Fraud, and Abuse

# A. Non-usage Policy

American Broadband will implement a non-usage policy whereby we will identify prepaid Lifeline customers that have not used the Company's Lifeline service for 60 days. Specifically, if no usage appears on an activated American Broadband pre-paid Lifeline customer's account during any continuous 60-day period, American Broadband will promptly notify the customer that the customer is no longer eligible for American Broadband Lifeline service subject to a 30-day grace period. During the 30-day grace period, American Broadband will engage in outreach efforts to determine whether the customer desires to remain on the Company's Lifeline service. If the customer's account does not show any customer-specific activity during the 30-day grace period (such as making or receiving a voice call to/from anyone

Lifeline Reform Order, ¶ 120.

other than American Broadband or its agent, sending a text message, downloading data or adding money to the account), American Broadband will deactivate Lifeline services for that customer unless the customer affirmatively responds confirming that the customer wants to continue receiving Lifeline. In addition, American Broadband will not seek to recover a federal Universal Service Fund subsidy for the minutes provided to the customer during the grace period or thereafter report that customer on its USAC Form 497 unless the customer reinitiates service. Customers will be informed at the time service is initiated of the deactivation and de-enrollment process that will occur as a result of non-usage.<sup>13</sup>

Customers that receive phones via mail rather than in person must activate their service before they can place calls. American Broadband ensures that phones shipped to customers are only capable of calling 911 and the Company's interactive voice response ("IVR") system. A customer must call the IVR in order to complete the activation process. The Company does not submit a customer who received a shipped phone for Lifeline reimbursement until the customer completes this IVR activation process. American Broadband will apply this activation policy for shipped wireless handsets.

American Broadband will consult with the state commissions (PUCs) in the states where it provides Lifeline services regarding implementation of the policy described above. American Broadband expects that certain state PUCs or similar agencies may seek to incorporate state-specific variations to the policy. Consequently, American Broadband may modify the parameters of the inactivity policy described herein after consultation with the respective state PUCs.

Lifeline Reform Order, ¶ 257.

# B. Customer Education with Respect to Duplicates

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, American Broadband will implement measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. Customers shall also be informed that the service is non-transferable. These measures entail additional emphasis in written disclosures as well as live due diligence.

- a) Call Center and Sales Script American Broadband will emphasize the "one Lifeline phone per household" restriction through its interaction with the potential customer at the call center. American Broadband will also emphasize the "one Lifeline phone per household" restriction through its direct sales contact with the potential customer. The sales training materials will include a discussion of the limitation to one Lifeline phone per household, and the need to ensure that the customer is informed of this restriction. Attached as Exhibit B is a sample of training material that is used to educate sales personnel of the FCC's regulations regarding the definition of household and the prohibition on multiple lines.
- b) Marketing, Advertising and Website Content American Broadband, in its marketing materials, will reinforce the limitation of one Lifeline phone per household. Attached as Exhibit C is a copy, to scale, of a two by three foot advertisement display, and description of wireless offerings.
  - c) In addition to reminding consumers of the one-per-household rule, American Broadband will comply with the other marketing requirements in the *Lifeline Reform Order* and will explain in all marketing materials that the service offering is a Lifeline-supported service, only eligible consumers may enroll, what documentation is necessary for enrollment, Lifeline is a government benefit program, and consumers who willfully make false statements to obtain Lifeline can be punished by fine or imprisonment or barred from the program.

These statements will also appear on the company's website (www.ambt.net) during the customer information/education cycle. At the point on its website when a customer inputs his/her zip code to verify that American Broadband offers service in their area, American Broadband will display the required marketing language in the section where the website explains the service and rate plan options. The message would flash to draw attention to it. In addition, American Broadband will include in its printed materials and website substantially the following statement "Not all Lifeline supported programs are identified as 'Lifeline' and may be marketed under other brand names."

# C. Cooperation with state and federal regulators

American Broadband has and will continue to cooperate with federal and state regulators to prevent waste, fraud and abuse, including:

- Sharing with state commissions (PUC), the FCC or USAC data that will enable that state, the FCC or USAC to determine whether some consumers are enrolled in more than one Lifeline program. Specifically, American Broadband agrees to make available state-specific customer data, including name and address, to each state PUC where it operates, the FCC or USAC for the purpose of permitting the PUC, FCC or USAC to determine whether an existing Lifeline customer receives Lifeline service from another carrier, and will participate in such a duplicate resolution process, provided that costs for participation are reasonable or defrayed through the universal service contribution mechanisms;
- Promptly investigate any notification that it receives from a state PUC, the FCC or USAC that one of its customers already receives Lifeline service from another carrier;
- Immediately deactivate a customer's Lifeline service and no longer report that customer
  on USAC Form 497 if American Broadband's investigation, a state, the FCC or USAC
  concludes that the customer receives Lifeline services from another carrier in violation of
  the Commission's regulations and that American Broadband's Lifeline service should be
  discontinued such as a de-enrollment notification pursuant to the FCC's June 17, 2011
  Report and Order (Section III, B.).

# V. Included Usage

American Broadband will offer at least one Lifeline plan that provides consumers with at least 250 included minutes-of-use per month at the lowest end user rate permitted under FCC rules. This provision will expire 36 months from the date of approval of this Compliance Plan.

#### VI. Service Areas

American Broadband operates as a wireline and wireless carrier in the states of Michigan, Ohio and Indiana. In Michigan, American Broadband is an ETC serving wireline Lifeline customers and has an application pending to provide Lifeline-only wireless services. American Broadband's service territory in Michigan includes the non-rural wire centers and study areas of AT&T Michigan, Frontier North, Inc., Frontier Midstates, Inc., CenturyTel Midwest - Michigan,

Inc., CenturyTel of Michigan, Inc., CenturyTel of Northern Michigan, Inc., CenturyTel of Upper Michigan, Inc., Frontier Communications of Michigan, Inc., Deerfield Farmer's Telephone Company, Ogden Telephone Company, and Sand Creek Telephone Company. In Ohio, the Company is designated as an ETC for wireline services and has an application pending to provide Lifeline-only wireless services in certain exchanges of Verizon North Inc. and AT&T Ohio. In Indiana, the company is licensed as a CLEC in the territories of Frontier and AT&T (fka Indiana Bell). The company serves approximately 1,000 customers in Indiana. The company currently has an application to become a ETC in Indiana pending before the Indiana Utility Regulatory Commission.

Note that American Broadband does not provide service to any Tribal areas, nor do its current business plans anticipate serving Tribal areas in the future. If and when American Broadband plans to expand its service to Tribal areas, American Broadband will amend its application and certification forms to reflect requirements specific to the service of Tribal areas.

# VII. Statements required under Section 54.2002 of the Commission's Rules

#### A. Compliance with Service Requirements

American Broadband certifies that it does now, and will in the future comply with all applicable state and federal requirements applicable to the receipt of Lifeline support.

# B. Emergency Functionality

American Broadband is technically qualified to remain functional during emergency situations. In particular, American Broadband's critical infrastructure, its Class 5 switch, is located in a facility that provides redundant and battery back-up power to minimize the risk of service outages during emergency situations. In addition, as a reseller of wireline and wireless

services, American Broadband relies on the network redundancy and disaster preparedness of its network suppliers.

#### C. Consumer Protection

American Broadband is committed to provide service consistent with appropriate standards for customer protection as established by the FCC and the applicable state Commissions (Ohio, Michigan and Indiana). For the Company's wireless services, American Broadband is committed to providing service in accordance with CTIA's Consumer Code for Wireless Service.

# D. Technical and Financial Qualifications

In accordance with the *Lifeline Reform Order*,<sup>14</sup> American Broadband submits that it is technically and financially qualified to operate as a Lifeline-only ETC. As noted above, American Broadband already operates as a wireline Lifeline ETC in the states of Michigan and Ohio, and is licensed as a telecommunications carrier in Ohio, Michigan and Indiana. American Broadband serves more than 30,000 customers in these three states, including more than 10,000 Lifeline-qualified wireline customers in Ohio and Michigan.

The Company's management has more than 50 years experience in the telecommunications industry. The Company owns and operates a partially facilities-based network, including a class 5 switch located in Toledo, Ohio. The Company's financial qualifications are well established, after having been deemed financially qualified to be both a licensed telecommunications carrier and an ETC by two state commissions. Lifeline customers are a relatively small part of the Company's overall revenue, and the Company is not dependent upon Lifeline support revenue as its primary source of income. The Company operates

Lifeline Reform Order, at  $\P$  387.

profitably and has never filed for bankruptcy protection and plans measured expansion into

neighboring states as business conditions allow.

American Broadband is a privately-held company and has no parent company and no

affiliated companies. American Broadband has never been the subject of a state enforcement

action or ETC revocation proceedings in any state.

 $\boldsymbol{E}$ . Lifeline Service Offerings

The required information regarding the Company's Lifeline offerings is included in

section V., above, as well as Exhibit C to this filing.

Conclusion

American Broadband respectfully requests that the Commission expeditiously approve its

Compliance Plan so that the company may begin providing the benefits of Lifeline service to

qualified low-income customers as soon as possible.

Respectfully submitted,

/s/ electronically signed

Tamar E. Finn

Douglas D. Orvis II

Kimberly A. Lacey

Bingham McCutchen LLP

2020 K Street, N.W.

Washington, DC 20006

Dated: April 27, 2012

-19-

# Exhibit A

Sample Application Form

# **Wireless Lifeline Assistance Application**

PLEASE MAIL OR FAX SIGNED APPLICATION TO:

ABT Wireless Lifeline- PO Box 577 Toledo, OH 43697

Toll free: 877-777-7922 Fax: 877-211-3705



# PLEASE READ, INITIAL AFTER EACH STATMENT AND SIGN THE FOLLOWING STATEMENT

By signing below, I certify under penalty of perjury – (additionally, please initial each of the 11 statements below)

Sig	gnature Date
	Perjury and false statements are punishable by fines and/or imprisonment.
11.	I understand that if I have listed a temporary residential address, I will be required to verify my temporary residential address every 90 days
10.	I understand that my name, telephone number, and address will be divulged to the Universal Service Administrative Company (USAC) (the administrator of the program) and/or its agents for the purpose of verifying that I, or my household, do not receive more than one Lifeline benefit. I consent to inclusion of this information in the support database
9.	I certify that I meet the income-based or program-based eligibility criteria for receiving Lifeline service as described by FCC rules
8.	I understand that I may be required to re-certify my continued eligibility at any time, and at least annually, and failure to so will result in the termination of my Lifeline benefits
7.	I will notify AB&T within 30 days if I, or any member of my household, no longer qualify for Lifeline, I or any members of my household move, or if I, or any member of my household, are receiving more than one Lifeline-supported service.
6.	I understand that Lifeline is a non-transferrable benefit and certify that I will only use this phone for my household's own use and will not resell or transfer it
5.	I understand that I must cancel any Lifeline service or port my number to AB&T prior to establishing my service with AB&T.
4.	I understand that I must notify AB&T within 30 days if I cease to participate in a qualifying federal program or my annual household income exceed this threshold
3.	I understand that households are not permitted to receive Lifeline benefits from multiple providers. (Some Lifeline services are not marketed under a "Lifeline" name; these include Lifeline services sold under the names AT&T Lifeline, Assurance Wireless, and Safelink.) I certify that to the best of my knowledge, I, and any members of my household, will only receive Lifeline from American Broadband & Telecommunications (AB&T).
2.	I understand that Lifeline is a federal benefit and is only available for one phone line per household, whether landline or wireless. For purposes of the Lifeline program, a household is any individual or group of individuals who live together at the same address and share income and expenses. Violation of the one-per-household requirement is a violation of FCC rules, will result in de-enrollment from the Lifeline program and potentially prosecution by the federal government
1.	The information contained within this application is true and correct. I acknowledge that providing false or fraudulent documentation in order to receive assistance is punishable by fines, imprisonment, de-enrollment or being barred from the program

# Wireless Lifeline Assistance Application PLEASE MAIL OR FAX SIGNED APPLICATION TO:

**FAX SIGNED APPLICATION TO 877-211-3705** 

ABT Wireless Lifeline-PO Box 577 Toledo, OH 43697

Toll free: 877-777-7922 Fax: 877-211-3705



v.ASSISTWRLSv.022712

#### PLEASE COMPLETE BOTH SIDES OF THIS APPLICATION

Your Name:(Last)	(First)	(Middle	Initial)
Current Home Telephone Number:	Best Conta	ct or Cell Number:	
Residential Address:(Number)	(Street)	(Apartment,	Floor)
City/Town:	` ,	` .	
Is this a Permanent Address? YES NO		-	
		_ast 4 Digits of Your Social Security Nu	mber
Is this a multiple household address? $\square$ YES	└ NO Billing Ad	ddress (if different from Residential add	ress)
(Number) (Street) (Apartmen	nt, Floor) City/Town	State	Zip Code
Please Select Your Wireless Plan		New York Control of the Control of t	
Lifeline Wireless Essentials 250	Lifeline Wireless Esse	entials 500 Lifeline Wirele	ess Unlimited
Program Eligibility			
I receive Assistance from one of the following programs	(Check all that apply) (NOTE: Social Se	curity and Medicare Alone <u>DO NOT</u> qualify for L	ifeline):
☐ Food Stamps	☐ Federal Public Housing and	or Section 8 Disability Assistanc	e
☐ Medicaid (Not Medicare)	Ohio or Michigan Works Fire	st /TANF	nch Program
☐ Supplemental Security Income (SSI) ☐ Federal Public Housing Assistance (Section	Low Income Home Energy A (LIHEAP) n 8)	Assistance Temporary Assistar Families (TANF)	nce for Needy
AMBT USE ONLY — Please identify which Progration Proof of Food Stamp Participation Medicaid (Not Medicare)- Program Documentation Supplemental Security Income (SSI) Participation	m Documents from the Box abov	n 8 Disability Assistance Parti- documentation National School Lunch Pro e-Documents Temporary Assistance for	cipation Certification ogram Eligibility
Income Based Eligibility – DO NOT O	COMPLETE THIS SECTION IF YOU CO	MPLETED THE PROGRAM ELIGIBILITY SECT	TION ABOVE
Calculate TOTAL household income by reporting	the income of all adult persons res	iding in your home in the appropriate categ	jory:
Household Size Maximum Yearly Inc	ome Proof of Income Do	cumentation Examples Include:	
1 \$16,335 2 \$22,065		State or Federal income tax return <b>OR</b> type of current statement from the income source	a(c) noted below:
\$27,795 \$	: Three cons	ecutive months' worth of your most current pay ity benefits statement	
	∀ Veterans Ad	ministration benefits statement Pension benefits statement	
If you have more than 3 people in your household, write the nu add \$5,730 for each additional person on top of the \$27,795	ımber and Divorce decr	ee or child support document ent/Workers Compensation benefits statement	
I authorize AB&T to Contact my Case Worker to Veri Name of Case Worker:	fy Eligibility:	Phone Number:	
Eligibility verified by (initial all that apply) (1) Reviewing Cu	ıstomer Documentation; (2) Contac	ting Caseworker; (3) Eligibility Database Ver	rification
NOTE: YOU MUST COMPLETE BOT	H SIDES OF THIS FORM BEF	ORE WE CAN PROCESS YOUR APF	PLICATION

# Exhibit B

Training Materials

# American Broadband & Telecommunications Call Center/Sales Training

# The following information may be used by sales and calling center staff to respond to inquiries about Lifeline supported services.

- (1) Confirm the individual is the head of household and they are not currently receiving a Lifeline subsidized service through the following questions:
- "Do you currently have wireless or home phone service?"
- If no: skip remaining questions and complete application process.
- If yes: "Is the [wireless or home phone] service a subsidized service or do you pay full price?"
- If subsidized: "By law, the Lifeline program is only available for one phone per household. Do you know if your current phone is subsidized under the Lifeline program?"
- If individual is not sure: "Who is your provider for that service? What is the name of the service?" (Note that Assurance Wireless and SafeLink are Lifeline services.)
- If it is a Lifeline service: "We cannot provide you with a second Lifeline phone. If there is a problem with your current service, and you would like to switch to our service, you must authorize ABT to port your telephone number to our service."
- (2) If it appears that the individual does not currently have Lifeline service, proceed with the following steps:
- Using ABT's database, verify the individual (name, date of birth, last four digits of social security number) is not currently in the ABT system as a registered recipient of Lifeline services. Repeat with state/USAC database if and when available.
  - o If there is an active Lifeline account for that individual, explain that "by law, the Lifeline program is only available for one phone per household." For example, if the customer is in ABT's database, inform the customer that they must choose ABT wireline Lifeline OR wireless Lifeline service.
  - o If there is no active account for that individual, proceed with the application process.
- Using ABT's database, verify the individual's address is not currently in the ABT system as a registered recipient of Lifeline services. Repeat with state/USAC database if and when available.

- o If there is an active Lifeline account for that address, explain that "by law, the Lifeline program is only available for one phone per household."
- Explain that, for purposes of the Lifeline program, a household is any individual
  or group of individuals who live together at the same address and share income
  and expenses.
- o If customer states address is multifamily or group housing, use USAC form (when developed) to determine if customer qualifies for Lifeline as multiple household.
- o If there is no active account for the applicant's address or household, proceed with the application process.
- (3) If check of database(s) verifies individual is not current Lifeline recipient, assist customer in completing application.
- Customer must complete both sides of form.
- Confirm residential address is billing address. If not, collect billing address IN ADDITION TO residential address.
- If address is not permanent, explain that American Broadband must verify address every 90 days. If customer does not respond, Lifeline service will be deactivated.
- Explain service plan options (refer to service description sheet). For customers that elect pre-paid Lifeline Wireless Essentials 250, explain non-usage policy.
  - o If no usage appears on an activated American Broadband pre-paid Lifeline customer's account during any continuous 60-day period, American Broadband will promptly notify the customer that the customer is no longer eligible for American Broadband Lifeline service subject to a 30-day grace period.
  - During the 30-day grace period, American Broadband will attempt to reach customer to determine whether the customer desires to remain on the Company's Lifeline service.
  - o If the customer's account does not show any customer-specific activity during the 30-day grace period (such as making or receiving a voice call to/from anyone other than American Broadband or its agent, sending a text message, downloading data or adding money to the account), American Broadband will deactivate Lifeline services for that customer unless the customer affirmatively responds confirming that the customer wants to continue receiving Lifeline.
- With the exception of program eligibility/income eligibility, all sections must be completed.

- o Customer should complete EITHER program eligibility OR income eligibility section.
- o Review customer documentation supporting eligibility carefully, note which documents reviewed in ABT database.
- Ensure customer reads and initials statements 1-8 on certification section.

# Exhibit C

Sample Advertisement and Description of Wireless Offerings

# GET CONNECTED... STAY CONNECTED.

GET WIRELESS LIFELINE.



Wireless Lifeline is a government assisted program that provides qualified low-income consumers with:

- Free cellular phone, provided by American Broadband\*
- Includes 250 minutes free monthly airtime, local or long distance
- Free 911 access
- · No credit check

Service provided by American Broadband and Telecommunications, a local wireless provider of Lifeline-supported services.

SIGN UP TODAY.

Call 1 (877) 777-7922
Fax your application to 1 (877) 211-3705
Visit www.ambt.net

You may only have one Lifeline-supported line, either wireless or wireline, per household. Only eligible customers may enroll in the Lifeline program. Proof of eligibility, such as documentation of receipt of benefits (such as Medicaid, TANF or SSI) or proof of income (such as tax returns or pay stubs), is required to enroll. Lifeline is a federal benefit program; persons making false statements in order to obtain Lifeline service can be subject to fines, imprisonment or barred from the Lifeline program.

\* Free phone is not supplied or subsidized by any government program.



Plan Price: Free\*

Plan Price: \$9.95 per month

Plan Price: \$39.95 per month

# Stay Connected Wirelessly with:

- · Potential or current employers
- · Children who are at home while their parents have to go to work
- Healthcare specialists
- · Vital emergency responders
- Relatives during a personal emergency

# ALL American Broadband & Telecommunications Wireless Lifeline plans come with:

- Superior areas of coverage throughout the entire United States
- Access to 411 with no airtime charges
- Unlimited 911 access
- Call waiting
- Call ID
- Voicemail

# 3 Great Plans to Choose From!

#### Lifeline Wireless Essentials 250

- 250 FREE Voice Minutes added every month, automatically, you do nothing.
- Includes Free Cell Phone\*
- Access to 911
- Free Voicemail, Caller ID and Call Walting
- Access to Operator Service and Directory Listing. OSDA service includes information and connection to publicly listed, domestic, landline telephone numbers and Addresses.
- No annual contract, no monthly Bills

# Lifeline Wireless Essentials 500

- 500 Voice Minutes added every month, automatically, you only pay \$9.95.
- Includes Free Cell Phone\*
- Access to 911
- Free Voicemail, Caller ID and Call Waiting
- Access to Operator Service and Directory Listing. OSDA service includes information and connection to publicly listed, domestic, landline telephone numbers and Addresses.
- No annual contract

# Lifeline Wireless Unlimited

- Unlimited Voice Minutes and Unlimited Texting, you only pay \$39.95.
- Includes Free Cell Phone\*
- Access to 911
- Free Voicemail, Caller ID and Call Waiting
- Access to Operator Service and Directory Listing. OSDA service includes information and connection to publicly listed, domestic, landline telephone numbers and Addresses.
- No annual contract

# Need More Minutes? We have 6 Easy Top Up Plans. You can Add Minutes 24 hours per Day, 7 Days Per Week.

Options* 100 Talk or Text Minutes	<u>Price</u> \$3.99	Options* 240 Talk or Text Minutes	<u>Price</u> \$ 9.99
180 Talk or Text Minutes	\$5.99	360 Talk or Text Minutes	\$12.99
200 Talk or Text Minutes	\$6.99	500 Talk or Text Minutes	\$19.99

<sup>\* 1</sup> Text is the equivalent of 1 minute of talk time

<sup>&</sup>quot;Assumes initial and continued program eligibility requirements are met - Non-usage for 60 days will result in a notice that service will be deactivated in 30 days; if customer actively uses service during the 30-day grace period, service will remain active.

<sup>\*</sup>Assumes initial and continued program aligibility requirements are met

<sup>\*</sup>Assumes initial and continued program eligibility requirements are met

# Exhibit B

American Broadband and Telecommunications Company
Certification & Affidavit

# BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO	. 2012	-C
IN RE:	)	
Application of American Broadband and	)	CERTIFICATION AND AFFIDAVIT
Telecommunications Company	)	PAT TREPTA V L R
For Designation as an Eligible Telecommunications Carrier for the	í	
Purpose of Offering Lifeline Service	Ĵ	
on a Wireless Basis	)	

- I, Jeffrey Ansted, being duly sworn upon oath, do hereby depose and state the following:
- 1. My name is Jeffrey Ansted. I am employed by American Broadband and Telecommunications Company ("American Broadband") as the President and Chief Executive Officer. My business address is One Seagate, Toledo, Ohio 43604. I am an officer of American Broadband and, as such, am authorized to make this Affidavit on its behalf, and it is based upon my personal knowledge. This Affidavit is given in support of American Broadband's application for designation as an Eligible Telecommunications Carrier for Lifeline purposes in South Carolina.
- On behalf of American Broadband, I certify and assert the following:
  - 1. I have read the foregoing Application, know the contents thereof, and to the best of my knowledge, information and belief, the facts set forth in the foregoing Application are true and correct.
  - 2. American Broadband will provide service throughout its designated service area upon receipt of a reasonable customer request for service.
  - 3. Noting that the FCC has eliminated its former requirement that ETCs commit to provision of equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within a service area. American Broadband nevertheless acknowledges the jurisdiction of the FCC to impose such a requirement and commits to compliance with such an obligation should the FCC impose it.
  - 4. American Broadband operates as a common carrier.

- 5. American Broadband will offer the services that are supported by the federal universal service support mechanisms by reselling the services of underlying facilities-based wireless providers, pursuant to the Federal Communications Commission's grant of blanket forbearance from the "own facilities" requirement of Section 214(e)(1)(A) of the Communications Act of 1934.
- 6. American Broadband will advertise the availability of its Lifeline service offerings and their terms and conditions in media of general distribution.
- 7. American Broadband will be able to function in emergency situations based upon the network capabilities of its underlying carriers.
- 8. American Broadband will comply with all applicable state and federal consumer protection and service quality requirements, including the CTIA Consumer Code for Wireless Service.
- 9. American Broadband has set in place certification policies and procedures that enable prospective customers to demonstrate their eligibility while protecting against fraud, waste and abuse pursuant to the FCC's February 2012 *Lifeline Reform Order*.
- 10. American Broadband will comply with the FCC's requirements concerning deenrollment of customers based on non-usage or when customers cease to be eligible for Lifeline benefits.

By: Jeff Ansted

Title: President/Chief Executive Officer

Subscribed and sworn to before me this 4 day of February, 2015

Notary Public

My Commission expires: 5 67.18

\* MYC

KATHLEEN K. YOAKAM NOTARY PUBLIC - OHIO MY COMMISSION EXPIRES 05-07-2018

# **Exhibit C**

Two-Year Marketing & Advertising Plan

#### **Advertising Plan**

American Broadband & Telecommunications (AB&T), through its American Assistance brand, will immediately begin its advertising and outreach program, in the service areas that it is designated as an ETC in the state of South Carolina, one granted ETC status. This program will run for a period of no less than 24 months. AB&T will use advertising, in the media of general distribution, to promote maximum visibility of its Lifeline services offering. In addition to advertising, AB&T will immediately begin engaging public service and community agencies that service the demographic that is eligible to enroll in the Lifeline program. AB&T has a long track record of successful outreach and promotion of its Lifeline service offering and in educating the public of the benefits, rules and regulations of the Lifeline program.

# **Advertising Plan**

We intend to advertise the availability of the program through the following mediums:

Printed Medium – Selected based on the requirements of the FCC's rules under 54.405 and 54.411, requiring ETCs to publicize the availability of Lifeline services in a manner reasonable to reach those likely to qualify for Lifeline.

- Newspaper Local and regional
- Print Mail and direct marketing to likely Lifeline eligible households
- Brochures handed out at community events

**Web Based Advertising** – American Broadband & Telecommunications currently advertises their Lifeline program on the following website:

- www.americanassistance.com
- We use both printed media and several pay per click web advertising companies to drive traffic to this informational website. On this site, the customer can learn about the program, enroll and re-certify their eligibility.
- AB&T will provide South Carolina specific target advertisement of their services once granted ETC status to drive South Carolina resident to this site.

**Community and Governmental Agency Outreach** – AB&T has a long and successful history of community engagement and outreach to promote community awareness of the Lifeline program. AB&T currently has relationships with:

- Department of Human Services or its equivalent agency in every state we have ETC status
- Social Security agencies
- Religious organizations
- Senior service agencies
- Food banks or similar organizations
- Many other local or regional organizations that service the community most likely eligible for Lifeline services

# **Exhibit D**

American Broadband and Telecommunications Company

Proposed Designated Service Areas

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LAKE WYLIE I AKE WYLIE	CANE WILLE	CAMDEN	COLUMBIA	NORTH AUGUSTA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	DENMARK	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	COLUMBIA	CLOVER
LKWLSCRSRS1	Chivitachus I	CMDNSCMAA3F	CLMASCAR75F	NAGSSCMA27E	CLMASCSA77E	CLMASCDF78E	CLMASCSN79F	CLMASCSN79F	CLMASCAR75E	CLMASCCH78E	CLMASCSN79F	CLMASCSU78E	CLMASCSW79E	CLMASCPARS1	CLMASCSN79F	CLMASCSU78E	CLMASCSN79F	CLMASCDF78E	CLMASCSA77E	CLMASCAR75E	CLMASCSCRS2	CLMASCSN79F	CLMASCCH78E	CLMASCSN79F	CLMASCSN79F	CLMASCSA77E	CLMASCSH77E	CLMASCSN79F	CLMASCSN79F	CLMASCDF78E	CLMASCSU78E	CLMASCSH77E	CLMASCAR75E	CLMASCSU78E	CLMASCCH78E	CLMASCSU78E	CLMASCSW79E	DNMKSCESRS1	CLMASCSW79E	CLMASCSW79E	CLMASCSA77E	CLMASCSN79F	CLMASCSN79F	CLVRSCESRS1
9417 LAKE WYLIE 9417 LAKE MYLIE	מייים אייין אייין דיריס	9417 CAMIDEN	9417 COLUMBIA	9417 BEECH IS	9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA		9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA		9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA		9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA	9417 DENMARK	9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA	9417 COLUMBIA	9417 CLOVER
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL		INC DBA SOUTHERN BELL TEL		INC DBA SOUTHERN BELL TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL		BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL					_	_					_	-			_	_	_	_	_					-		BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL			BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL
803 701 SC 803 701 SC	•	713	714	725	803 731 SC	803 732 SC	803 733 SC	734	735	736	803 737 SC	738	739	741	742	743	748	749	750	754	755	758	763	765	771	772	176	777	779	781	782	783		787	788	790	791	793	803 794 SC	796	803 798 SC	799	803 806 SC	803 810 SC

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NORTH AUGUSTA COLUMBIA	BEECH ISLAND	LAKE WYLIE	COLUMBIA	BEECH ISLAND	COLUMBIA		COLUMBIA																																					
NAGSSCMA27E WCLMSCMARS1	BHISSCMAR51	LKWLSCRSRS1	CLMASCSA77E	CLMASCCH78E	BHISSCMARS1	CLMASCCH78E	XXXXXXXXX	CLMASCSA77E	CLMASCSN79F	CLMASCBQRS1	CLMASCBQRS1	CLMASCBQR51	CLMASCBQRS1	CLMASCBQR51	CLMASCBQRS1	CLMASCBQR51	CLMASCBQRS1	CLMASCBQR51	CLMASCBQR51	CLMASCBQR51	NOCLLIKNOWN																							
9417 NO AUGUSTA 9417 COLUMBIA	9417 BEECH IS	9417 LAKE WYLIE	9417 COLUMBIA	9417 BEECH IS	9417 COLUMBIA	9417 XXXXXXXXX	9417 COLUMBIA	9417																																				
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL
803 819 SC 803 822 SC	803 827 SC	803 831 SC	803 832 SC	832	832	863	863	803 863 SC	863	863	863	863	863	863	863	863	865						870					870	870			868	907	907	907		907	907	907	907	907	907	907	803 919 SC

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803	925 SC	BELLSOUTH TELECOMMING DBA SOUTHERN BELL TEL & TEL	9417 HICKORYGRV	HCGVSCMARS1	HICKORY GROVE
803	92b SC	BELLSOUTH TELECOMIM INC DBA SOUTHERN BELL TEL & TEL		CLMASCSW79E	COLUMBIA
803	371 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 SHARON	SHRNSCMARS1	SHARON
803	929 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 COLUMBIA	CLMASCSN79F	COLUMBIA
803	931 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 COLUMBIA	CLMASCSN79F	COLUMBIA
803	932 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 CHPNLTLMTS	CHAPSCCLRS1	
803	933 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 COLUMBIA	CLMASCSN79F	COLUMBIA
803	935 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 COLUMBIA	CLMASCBQRS1	COLUMBIA
803	935 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 COLUMBIA	CLMASCBQRS1	COLUMBIA
803	936 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 COLUMBIA	CLMASCSW79E	COLUMBIA
803	939 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 COLUMBIA	CLMASCSW79E	COLUMBIA
803	945 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 CHPNLTLMTN	CHAPSCCLR52	CHAPIN-LITTLE MOUNTAIN
803	952 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 BEECH IS	NAGSSCMA27E	NORTH AUGUSTA
803	955 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 COLUMBIA	CLMASCSCR52	COLUMBIA
803	962 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 MILL CREEK	GSTANCSO85G	GASTONIA
803	970 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 XXXXXXXXX	XXXXXXXXX	
803	975 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 COLUMBIA	CLMASCSN25E	COLUMBIA
803	988 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 COLUMBIA	CLMASCSN79F	COLUMBIA
803	3S 066	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 XXXXXXXXX	XXXXXXXXXX	
843	202 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 CHARLESTON	CHTNSCN074F	CHARLESTON
843	204 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 XXXXXXXXX	XXXXXXXXXX	
843	207 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 CHARLESTON	CHTNSCLB55E	CHARLESTON
843	216 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 MTPLEASANT	MNPLSCES88F	MOUNT PLEASANT
843	218 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 CHARLESTON	CHTNSCN074F	CHARLESTON
843	243 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 CHARLESTON	SBRKSCSKRS1	CHARLESTON
843	262 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 ROWLAND	<b>RWLDNCMARS0</b>	ROWLAND
843	265 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 NEWTONVL	GBSNNCMARSO	GIBSON
843	275 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 MARION	MARNSCMA42E	MARION
843	292 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 FLORENCE	<b>FLRNSCMA66F</b>	FLORENCE
843	308 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 CHARLESTON	CHTNSCN074F	CHARLESTON
843	317 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 FLORENCE	<b>FLRNSCMA66F</b>	FLORENCE
843	320 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 CHERAW	CHRWSCES53E	CHERAW
843	323 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 CHARLESTON	CHTNSCDP82E	CHARLESTON
843	323 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 CHARLESTON	CHTNSCDP82E	CHARLESTON
843	332 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 HARTSVILLE	HTVLSCMA33E	HARTSVILLE
843	339 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 HARTSVILLE	HTVLSCMA33E	HARTSVILLE
843	346 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 TIMMONSVL	TMVLSCMARS1	TIMMONSVILLE
843	362 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 MARION	MARNSCBNRS1	MARION
843	375 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 MTPLEASANT	MNPLSCES88F	MOUNT PLEASANT
843	375 SC		9417 MTPLEASANT	MNPLSCES88F	MOUNT PLEASANT
843	375 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 MTPLEASANT	MNPLSCES88F	MOUNT PLEASANT
843	378 SC		9417 SOCIETY HL	SCHLSCESRS1	SOCIETY HILL
843	383 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 HARTSVILLE	HTVLSCMA33E	HARTSVILLE
843	388 SC		9417 MTPLEASANT	MNPLSCES88F	MOUNT PLEASANT
843	393 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 DARLINGTON	DRTNSCMA39F	DARLINGTON
843	395 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 DARLINGTON	DRTNSCMA39F	DARLINGTON

BELISOUTH TELECOMM INC DBA SOUTHERN BELL TEL® TEL BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL®
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL BELLSO

8.43	641 SC	RELISOLITH TELECOMM INC DBA SOLITHERN BELL TEL & TEL	OA17 CHARIESTON	CHTNSCI BSSE	CHABIESTON	436
		BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CHARLESTON	CHTNSCLBSSE	CHARLESTON	436
843 (	641 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CHARLESTON	CHTNSCLB55E	CHARLESTON	436
843 (	641 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 CHARLESTON C	CHTNSCLBSSE	CHARLESTON	436
843 (	654 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 MTPLEASANT N	MNPLSCES88F	MOUNT PLEASANT	436
843 (	654 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 MTPLEASANT N	MNPLSCES88F	MOUNT PLEASANT	436
843 (	654 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 MTPLEASANT N	MNPLSCES88F	MOUNT PLEASANT	436
843 (	661 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 FLORENCE	FLRNSCMA66F	FLORENCE	432
843 (	662 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 FLORENCE F	FLRNSCMA66F	FLORENCE	432
843	664 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 FLORENCE F	FLRNSCMA66F	FLORENCE	432
843 (	965 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 FLORENCE F	FLRNSCMA66F	FLORENCE	432
843 (	967 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 FLORENCE F	FLRNSCMA66F	FLORENCE	432
843	2S 699	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL		FLRNSCMA66F	FLORENCE	432
843	673 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 FLORENCE F	FLRNSCMA66F	FLORENCE	432
843	674 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL		FLRNSCMA66F	FLORENCE	432
843	976 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 FLORENCE F	FLRNSCMA66F	FLORENCE	432
843	678 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL		FLRNSCMA66F	FLORENCE	432
	92 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	FLORENCE	FLRNSCMA66F	FLORENCE	432
	95 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	٠.	SUVLSCMA87E	SUMMERVILLE	436
		BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CHARLESTON	CHTNSCDT72E	CHARLESTON	436
	721 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	_	CHTNSCDT72E	CHARLESTON	436
843	722 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	_	CHTNSCDT72E	CHARLESTON	436
843	723 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL		CHTNSCDT72E	CHARLESTON	436
	724 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CHARLESTON	CHTNSCDT72E	CHARLESTON	436
	727 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CHARLESTON	CHTNSCDT72E	CHARLESTON	436
	732 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	SULLIVNSIS	SPLSCISRS1	ISLE OF PALM	436
	732 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL		SPLSCISRS1	ISLE OF PALM	436
843	736 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 FLORENCE	FLRNSCMA66F	FLORENCE	432
843	740 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 CHARLESTON (	CHTNSCN074F	CHARLESTON	436
843	743 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CHARLESTON	CHTNSCN074F	CHARLESTON	436
843	744 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 CHARLESTON (	CHTNSCN074F	CHARLESTON	436
843	745 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	_	CHTNSCN074F	CHARLESTON	436
843	746 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	_	CHTNSCN074F	CHARLESTON	436
843	747 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 CHARLESTON (	CHTNSCN074F	CHARLESTON	436
843	752 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 LATTA	LATTSCLSRS1	LATTA	432
843	759 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	_	LKVWSCMARS1	LAKE VIEW	432
843	760 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	_	CHTNSCLB55E	CHARLESTON	436
843	762 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 CHARLESTON (	CHTNSCJM79E	CHARLESTON	436
843	763 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 CHARLESTON	CHTNSCWA85E	CHARLESTON	436
843	764 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 CHARLESTON	CHTNSCDP82E	CHARLESTON	436
843	766 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 CHARLESTON	CHTNSCWA85E	CHARLESTON	436
843	767 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL		CHTNSCLB55E	CHARLESTON	436
843	768 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 CHARLESTON	SBRKSCSKRS1	CHARLESTON	436
843	769 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 CHARLESTON	CHTNSCWA85E	CHARLESTON	436
843	774 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 DILLON	DLLNSCMA77E	DIFTON	432
843	777 SC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	9417 FLORENCE	FLRNSCMA66F	FLORENCE	432

9417 CHARLESTON CHTNSCD772E 9417 CHARLESTON CHTNSCDP82E
9417 CHARLESTON CHTNSCDP82E
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9417 SUMMERVL SUVLSCMA87E
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BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL 9417 MTPLEASANT MNPLSCES88F MOUNT PLEASANT
& TEL 9417 HARTSVILLE HTVLSCMA33E HARTSVILLE
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BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL 9417 SUMMERVL SUVLSCMA87E SUMMERVILLE
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& TEL 9417 MTPLEASANT MNPLSCES88F MOUNT PLEASANT
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GREENVILLE	GREENVILLE	GREENVILLE	ANDERSON	GREENVILLE	GREENVILLE	GREENVILLE	GREENVILLE	GREENVILLE	GREENVILLE	ANDERSON	GREENVILLE	GREENVILLE	GREENVILLE	UNION	UNION	UNION	EASLEY	GREENVILLE	GREENVILLE	ANDERSON	BELTON	SPARTANBURG	, SPARTANBURG	GREENVILLE	HONEA PATH	GREENVILLE	GREENVILLE	GREENVILLE	ANDERSON	PICKENS	PICKENS	PICKENS	PICKENS	PICKENS	PENDLETON	FOUNTAIN INN	GREENVILLE	GREENVILLE	UNION	UNION	LYMAN	LYMAN		EASLEY	GREENVILLE
GNVLSCWR28F	GINVLOUWRZSF	GNVLSCWR28F	ARSNSCTVRS1	GNVLSCWR28F	GNVLSCWR28F	GNVLSCDT23F	GNVLSCCH24E	GNVLSCBE24E	<b>GNVLSCWE26E</b>	ARSNSCAHRS1	<b>GNVLSCWR28F</b>	GNVLSCDT23F	GNVLSCCR27E	UNINSCMA42E	UNINSCMA42E	UNINSCMA42E	ESLYSCMA85E	GNVLSCCH24E	GNVLSCWR28F	ARSNSCMA22F	BETNSCMA33E	SPBGSCMA57E	SPBGSCHW50E	GNVLSCDT23F	HNPHSCMARS1	GNVLSCDT23F	<b>GNVLSCBE24E</b>	GNVLSCDT23F	ARSNSCMA22F	PCKNSCES87E	PCKNSCES87E	PCKNSCES87E	PCKNSCES87E	PCKNSCES87E			GNVLSCDT23F	<b>GNVLSCCR27E</b>	UNINSCMA42E	UNINSCMA42E	LYMNSCIP433	LYMINSCES43E	XXXXXXXXXX	ESLYSCMA85E	GNVLSCDT23F
9417 GREENVILLE		9417 GREENVILLE		9417 GREENVILLE	9417 ANDERSON	9417 GREENVILLE	9417 GREENVILLE	9417 GREENVILLE	9417 UNION	9417 UNION	9417 UNION	9417 EASLEY	9417 GREENVILLE	9417 GREENVILLE	9417 ANDERSON	9417 BELTON	9417 SPARTANBG	9417 SPARTANBG	9417 GREENVILLE	9417 HONEA PATH	9417 GREENVILLE	9417 GREENVILLE	9417 GREENVILLE	9417 ANDERSON	9417 PICKENS	9417 PICKENS	9417 PICKENS	9417 PICKENS		9417 PENDLETON	9417 FOUNTANINN	9417 GREENVILLE	9417 GREENVILLE	9417 UNION	9417 UNION	9417 LYMAN	9417 LYMAN	9417 XXXXXXXXX	9417 EASLEY	9417 GREENVILLE					
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMINITING UBBA SOUTHERN BELL TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMIM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL
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GREENVILLE GREENVILLE GREENVILLE GREENVILLE	GREENVILLE GREENVILLE GREENVILLE GREENVILLE	GREENVILLE GREENVILLE GREENVILLE COWPENS	GREENVILLE PACOLET LYMAN GAFFNEY GAFFNEY	PENDLETON SPARTANBURG CENTRAL ANDERSON ANDERSON	ANDERSON ANDERSON ANDERSON ANDERSON ANDERSON ANDERSON ANDERSON	ANDERSON SPARTANBURG SPARTANBURG SPARTANBURG GREENVILLE SPARTANBURG SPARTANBURG	SPARTANBURG SPARTANBURG SPARTANBURG SPARTANBURG SPARTANBURG
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SPBGSCBS57E SPBGSCCV57E SPBGSCMA57E	SPBGSCMA57E SPBGSCMA57E SPBGSCMA57E	SPBGSCWV57E	FNVLSCMARS1	SPBGSCMA57E	SPBGSCWV57E	SPBG5CIMA57E	SPBGSCMA57E	SPBGSCMA57E	SPBGSCBS57E	GNVLSCVVLZUL	TRRSSCMARS1	CLSNSCMA65E	GNVLSCWR28F	WLHLSCESRS1	CENTSCWSRS1	PNTNSCMARS1	WMNSSCESRS1	CLSNSCMA65E	CLSNSCMA65E	CLSNSCMA65E	CLSNSCMA65E	JNVLSCMARS1	GNVLSCWR28F	GNVLSCWR28F	JONNSCESRS1	NOCLLIKNOWN	ARSNSCMA22F	WLHLSCESRS1	GNVLSCWR28F	<b>GNVLSCWR28F</b>	GNVLSCWR28F	GNVLSCWR28F	GNVLSCWR28F						
	9417 SPARTANBG 9417 SPARTANBG 9417 SPARTANBG			9417 SPARTANBG	9417 SPARTANBG				9417 SPARTANBG			9417 CLEMSON		9417 WALHALLA	9417 CENTRAL	9417 PENDLETON	9417 WESTMINSTR	9417 CLEMSON	9417 CLEMSON	9417 CLEMSON	9417 CLEMSON	9417 JONESVILLE	9417 GREENVILLE	9417 GREENVILLE	9417 JOANNA	9417	9417 ANDERSON				9417 GREENVILLE								
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578 579 580	864 582 SC 864 583 SC 864 585 SC	587	592	594	595	296	597	598	864 599 SC		610		864 627 SC	864 638 SC	864 639 SC	864 646 SC			654	929		674	864 675 SC	9/9		864 700 SC			797	797	797	797	797	797					864 797 SC

BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TELR, TIEL BELLSOUTH TELECOMM NO DBA SOUTHERN BELL TELR, TIEL BELLS
9417 GREER 9417 CLINTON 9417 TRAVESREST 9417 GREER 9417 GREER 9417 GREER 9417 CLEMSON 9417 SENECA 9417 GREER 9417 GREER 9417 GREER 9417 GREER 9417 SENECA 94
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BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL BELLSO

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843	915 SC	FRONTIER COMMUNICATIONS OF THE CAROLINAS INC - SC	4335 CONWAY	CNWYSCXA24E	CONWAY	432
843	916 SC	FRONTIER COMMUNICATIONS OF THE CAROLINAS INC - SC	4335 MYRTLE BCH	MYBHSCXM44E	GTD5	432
843	918 SC	FRONTIER COMMUNICATIONS OF THE CAROLINAS INC - SC	4335 MYRTLE BCH	MYBHSCAFDS0	DMS	432
843	946 SC	FRONTIER COMMUNICATIONS OF THE CAROLINAS INC - SC	4335 MYRTLE BCH	MYBHSCXM44E	GTDS	432
843	956 SC	FRONTIER COMMUNICATIONS OF THE CAROLINAS INC - SC	4335 LAKE CITY	LKCYSCXA39A	LAKE CITY	432
864	228 SC	FRONTIER COMMUNICATIONS OF THE CAROLINAS INC - SC	526 SIMPSONVL	SSVLSCXADS0	SIMPSONVILLE	430
864	447 SC	FRONTIER COMMUNICATIONS OF THE CAROLINAS INC - SC	4335 CALHOUNFLS	CLFLSCXADSO	CALHOUN FALLS	430
864	459 SC	FRONTIER COMMUNICATIONS OF THE CAROLINAS INC - SC	4335 ABBEVILLE	ABVLSCXADS0	ABBEVILLE	430
864	465 SC	FRONTIER COMMUNICATIONS OF THE CAROLINAS INC - SC	4335 MCCORMICK MCCRSCXBDS0	MCCRSCXBDS0	MCCORMICK	430
864	476 SC	FRONTIER COMMUNICATIONS OF THE CAROLINAS INC - SC	4335 WOODRUFF	WDRFSCXADS0		430
864	962 SC	FRONTIER COMMUNICATIONS OF THE CAROLINAS INC - SC	526 SIMPSONVL	SSVLSCXADS0	SIMPSONVILLE	430
864	963 SC	FRONTIER COMMUNICATIONS OF THE CAROLINAS INC - SC	526 SIMPSONVL	SSVLSCXADS0	SIMPSONVILLE	430
864	967 SC	FRONTIER COMMUNICATIONS OF THE CAROLINAS INC - SC	526 SIMPSONVL	SSVLSCXADS0	SIMPSONVILLE	430
864	983 SC	FRONTIER COMMUNICATIONS OF THE CAROLINAS INC - SC	4335 LAURENS	LRNSSCXCDS0	LAURENS	430
864	984 SC	FRONTIER COMMUNICATIONS OF THE CAROLINAS INC - SC	4335 LAURENS	LRNSSCXCDS0	LAURENS	430

#### PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

#### DOCKETING DEPARTMENT

#### NOTICE OF FILING

DOCKET NO. 2015-\_\_\_\_-C

American Broadband and Telecommunications Company ("American Broadband") filed an Application with the Public Service Commission of South Carolina (Commission), for designation as a wireless Eligible Telecommunications Carrier (ETC) pursuant to Section 214(e)(2) of the Telecommunications Act of 1934, as amended, and S.C. Code Ann. Regs. § 103-690. American Broadband seeks wireless ETC designation solely to provide Lifeline Assistance to qualifying South Carolina consumers. American Broadband does not seek access to funds from the federal Universal Service Fund (USF) for the purpose of providing service to high cost areas. American Broadband will provide Lifeline Assistance to qualifying customers requesting these services throughout its designated service area in South Carolina, pursuant to the USF and in accordance with 47 C.F.R. § 54.202(a)(1).

A copy of the Application is on file in the offices of the Public Service Commission of South Carolina, 101 Executive Center Drive, Saluda Building, Columbia, SC 29210; the Commission's website at www.psc.sc.gov, and is available through John J. Pringle, Jr., Adams and Reese, L.L.P. 1501 Main Street, 5<sup>th</sup> Floor, Columbia, SC 29201.

A public hearing, if scheduled, will be held in Columbia, South Carolina in the offices of the Commission at the above address, for the purpose of receiving testimony and other evidence from all interested parties regarding this Application. The time and date of any such hearing will be furnished to all interested parties at a later date.

Any person who wishes to participate in this matter, as a party of record with the right of cross-examination should

file a Petition to Intervene in accordance with the Commission's Rules of Practice and Procedure on or before
, 2015 and indicate the amount of time required for his presentation. Please include an email
address for receipt of future Commission correspondence in the Petition to Intervene. Please refer to Docket No.
2015C.
Any person who wishes to testify and present evidence at the hearing should notify the Docketing Department in writing at the address below, the Office of Regulatory Staff at Post Office Box 11263, Columbia, SC 29211, and
John J. Pringle, Jr., Esq. at the above address, on or before, 2015, and indicate the amount of
time required for his presentation. Please refer to Docket No. 2015C.
Any person who wishes to be notified of any change in the hearing, but does not wish to present testimony or be a
party of record, may do so by notifying the Docketing Department in writing at the address below on or before
, 2015. Please refer to Docket No. 2015C.

**PLEASE TAKE NOTICE:** Any person who wishes to have his or her comments considered as part of the official record of this proceeding <u>MUST</u> present such comments, in person, to the Commission during the hearing.

Persons seeking information about the Commission's Procedures should contact the Commission at (803) 896-5100.

Public Service Commission of South Carolina ATTN: Docketing Department Post Office Drawer 11649 Columbia, South Carolina 29211

March \_\_\_\_\_ 2015